



Deposition of:  
**Laura Marie Digges**

*September 23, 2021*

In the Matter of:  
**Curling, Donna v. Raffensperger, Brad**

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A P P E A R A N C E S

(All parties appeared remotely by Zoom  
videoconference.)

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A P P E A R A N C E S  
(continued)

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ALSO PRESENT:

Ms. Marilyn Marks, Executive Director  
Coalition for Good Governance

Mr. Matthew Riesdorff, Veritext Concierge Tech

Legend of the Transcript:

|            |  |
|------------|--|
| (sic)      | Exactly as said                          |
| (phonetic) | Exact spelling unknown                   |
| . . .      | Trailing off or did not complete thought |
| --         | Break in speech continuity               |
| uh-huh     | Affirmative                              |
| uh-uh      | Negative                                 |



I N D E X

WITNESS

PAGE

LAURA MARIE DIGGES

Examination By Mr. Jacoutot .....6

DEFENDANT'S EXHIBITS

EXHIBIT

NUMBER

DESCRIPTION

PAGE

Exhibit 1 Notice of Deposition .....11

Exhibit 2 CBS46 News article .....27

Exhibit 3 Coalition for Good Governance's .....33

and Coalition Plaintiffs'

Objections and Responses to

Defendant Brad Raffensperger's

First Request for Admission

Exhibit 4 ENET Report .....40

(Originally marked exhibits attached to the  
original of the deposition and a copy attached  
to all copies produced.)

## P R O C E E D I N G S

(1:28 p.m.)

(Whereupon, the court reporter complied with the requirements of O.C.G.A. Section 9-11-28(d).)

THE COURT REPORTER: Good afternoon. My name is Charlene Hansard. I am the court reporter. Today's date is September 23, 2021, and the time is approximately 1:29 p.m. Due to the government's order for social distancing, I will ask counsel to stipulate on the record that there's no objection to swearing in the witness remotely by video conference.

MR. JACOUTOT: No objection.

MR. ICHTER: So stipulated.

(The oath was administered to the witness by the court reporter.)

MR. JACOUTOT: This will be the deposition of Laura Digges taken by Defendant, Secretary of State, Brad Raffensperger, for the purpose of discovery and all purposes allowed under the Federal Rules of Civil Procedure. Did we swear in the witness just then? To the court reporter?

THE COURT REPORTER: Yes, sir, we did.

1 MR. JACOUTOT: Okay. Thanks. I got to pay  
2 attention. Great. And are we okay with reading  
3 and signing this deposition after the fact to  
4 ensure its accuracy?

5 MR. ICHTER: Yes.

6 Whereupon,

7 LAURA MARIE DIGGES,  
8 Having been first duly sworn, was examined and  
9 testified as follows:

10 EXAMINATION

11 BY MR. JACOUTOT:

12 Q. Okay. And my name is Bryan Jacoutot. As I  
13 stated earlier, I represent the State Defendants in  
14 this case. Ms. Digges, pleasure to meet you. Would  
15 you mind stating your full name for the record.

16 A. Laura Marie Digges.

17 Q. Great. And are you represented by counsel in  
18 this deposition?

19 A. Yes.

20 Q. And is that Mr. Ichter?

21 A. Yes.

22 Q. Okay.

23 MR. JACOUTOT: And counsel, can we agree  
24 that all objections except those going to the  
25 form of the question and responsiveness of the



1 answer are reserved until trial or first use of  
2 the deposition?

3 MR. ICHTER: That's fine.

4 MR. JACOUTOT: Great.

5 MS. ELSON: This is Hannah Elson from  
6 Morrison and Foerster here presenting the  
7 Curling Plaintiffs today.

8 MR. JACOUTOT: Okay. Great. Thank you,  
9 Ms. Elson.

10 BY MR. JACOUTOT:

11 Q. So Ms. Digges, have you had a deposition  
12 taken before?

13 A. No.

14 Q. Okay. Well, we're in, obviously, interesting  
15 times now doing it remotely. So since these are remote  
16 and done over Zoom and everything, it's likely that  
17 there might be some hiccups here and there, and we'll  
18 try to deal with them as best we can. But if you could  
19 please speak loudly and clearly as best you can and try  
20 not to talk over, you know, me, and I'll try not to  
21 talk over you when I'm asking a question. It is,  
22 again, more difficult over Zoom so it may happen here  
23 and there. And please keep your responses verbal as  
24 opposed to nodding your head or saying uh-huh or uh-uh  
25 and -- you know, just so the court reporter has a



1 little easier time taking that down. Is all that  
2 understood --

3 A. Yes.

4 Q. -- and agreeable?

5 A. Yes.

6 Q. Perfect. So the purpose here is not to  
7 confuse you. So if I ask you a question you don't  
8 understand or if I phrased it improperly, can you agree  
9 you'll let me know and I'll try to rephrase it a little  
10 better?

11 A. Yes.

12 Q. Thank you. Now here, you're being asked to  
13 testify based on your personal knowledge, so there's no  
14 need to speculate in response to any of my questions.  
15 It's perfectly acceptable if you don't know the answer.  
16 We can take a break at any time if you need one just to  
17 kind of get up and stretch or if you need to use the  
18 restroom, just let me know. The only thing I would ask  
19 is that if I've posed a question to you, that you would  
20 go ahead and answer that question before we take the  
21 break. Is that agreeable?

22 A. Yes.

23 Q. Okay. Have you taken any medications today  
24 that would keep you from fully and truthfully  
25 participating?

1 A. No.

2 Q. Okay. In preparing for this deposition,  
3 other than conversations with your attorneys, what did  
4 you do?

5 A. To prepare for this deposition? Well,  
6 obviously, I spoke to my attorney.

7 Q. Uh-huh.

8 A. I printed out copies of the Declarations. I  
9 loaded this Veritext to my computer, and that's it.

10 Q. Okay. Apart from the Declarations, did you  
11 look at any documents from the case before in  
12 preparation?

13 A. Not in preparation. I mean, I've, obviously,  
14 looked at them before, but not --

15 Q. Right.

16 A. -- in preparation for this, no.

17 Q. Okay. Did you bring anything with you today  
18 for the deposition?

19 A. Did I bring anything with me for the  
20 deposition?

21 Q. Yes. Any documents or anything like that?

22 A. I've got the copies of the Declarations here.

23 Q. Okay. Did you review or attend any testimony  
24 from the plaintiffs in this case before being deposed?

25 Because I know you're --

1 A. The depositions? No.

2 Q. Yeah.

3 A. No.

4 Q. So you were not in attendance at your  
5 husband's deposition earlier today?

6 A. No.

7 Q. Okay. Did you talk to anyone about your  
8 deposition other than your attorney?

9 A. No.

10 MR. ICHTER: Laura, you need to speak a  
11 little more loudly.

12 THE WITNESS: Sorry. I tend to be quiet,  
13 but I'll --

14 MR. ICHTER: What was your answer?

15 THE WITNESS: It was no.

16 MR. ICHTER: Okay.

17 BY MR. JACOUTOT:

18 Q. No. Okay. Thank you.

19 MR. JACOUTOT: And thank you, Cary.

20 MR. ICHTER: Sure.

21 BY MR. JACOUTOT:

22 Q. All right. I'm going to go ahead and direct  
23 you to Exhibit Share, and I'm going to go ahead and try  
24 and mark as Exhibit 1 the notice to take your  
25 deposition. Just bear with me for a moment.



1 (Exhibit No. 1, Notice of Deposition, was  
2 marked for identification purposes.)

3 BY MR. JACOUTOT:

4 Q. Okay. I'm going to share with you what's  
5 been marked Exhibit No. 1. And let me know when it  
6 shows up on your -- in your Exhibit Share. You might  
7 have to refresh. Is it there? It should be Exhibit  
8 0001.

9 A. Okay. There it is.

10 Q. Okay. So that is -- Can you confirm for me  
11 that that is the Notice of Deposition that you  
12 received?

13 A. Yes, it looks like it. Yeah. Yes.

14 Q. Okay. Great. I don't have any questions on  
15 that. I just wanted to go ahead and put it in the  
16 record for us.

17 A. All right.

18 Q. Can you give me your current address?

19 A. [REDACTED]  
20 [REDACTED], Marietta, Georgia 30066.

21 Q. Okay. Thank you. And how long have you  
22 lived in Cobb County?

23 A. 1996.

24 Q. Now, I know you said you've never had a  
25 deposition before. But have you ever been examined at



1 trial, cross-examined, anything like that, asked  
2 questions at a trial?

3 A. No.

4 Q. Okay. Have you ever been charged with a  
5 crime?

6 A. No.

7 Q. Have you ever been arrested?

8 A. No.

9 Q. Never convicted of a crime, then, I assume?

10 A. No.

11 Q. Okay. Are you a party in any other  
12 lawsuits -- active lawsuits?

13 A. No.

14 Q. Are you a party in any other prior lawsuits?

15 A. No.

16 Q. Okay. I'm just going to get some of your  
17 educational background. Did you attend high school?

18 A. Yes.

19 Q. And where was that?

20 A. Northern Highlands Regional High School,  
21 Allendale, New Jersey.

22 Q. And what were the approximate dates of your  
23 attendance there?

24 A. I graduated in 1971.

25 Q. Did you attend any college?

1 A. Yes.

2 Q. And where was that?

3 A. Alphonsus College in Woodcliff Lake, New  
4 Jersey.

5 Q. And the dates of attendance there?

6 A. I graduated in 1973.

7 Q. So two years after your high school  
8 graduation?

9 A. Yes.

10 Q. Okay. What did you study there?

11 A. Education -- Early childhood education.

12 Q. Okay. Did you -- Did you get a degree? Oh,  
13 you said you graduated; correct?

14 A. Yes.

15 Q. And was your degree in early childhood  
16 education?

17 A. Yes.

18 Q. Okay. Did you attend any graduate school?

19 A. No.

20 Q. Do you have any licenses, certifications, or  
21 vocational training, anything like that?

22 A. I had a medical office assistant  
23 certification.

24 Q. Okay. Anything else?

25 A. Working for IBM, I received some compliance

1       certifications. They had their own internal education  
2       and I received a few certifications from them --  
3       through them.

4           Q.    Okay. Any other type of education that you  
5       can name?

6           A.    No.

7           Q.    Okay. So do you have any education in  
8       election law or voting specifically?

9           A.    Education in voting law or -- Well, I -- I  
10       was a poll watcher. You know, I received training  
11       through -- through voter protection, but.

12          Q.    And who -- who gave you the training for poll  
13       watching?

14          A.    Democratic Party of Georgia.

15          Q.    Okay. Apart from that, do you have any  
16       specific education or training with respect to election  
17       law?

18          A.    No.

19          Q.    Okay. And in that training that you received  
20       from the Democratic Party of Georgia, did they give you  
21       any election administration for Georgia or any other  
22       state, any training in election administration  
23       specifically?

24          A.    No.

25          Q.    Okay. And you said you were a poll watcher



1 or you were trained as a poll watcher. Did you -- Did  
2 you actually go and, you know, poll watch during  
3 elections?

4 A. Yes.

5 Q. What years would you say you've done that  
6 for?

7 A. It was the 2018 gubernatorial election and  
8 then there was another one after it, and it was  
9 probably 2019.

10 Q. Have you ever worked at a polling place as a  
11 poll worker?

12 A. No.

13 Q. Okay. When you were doing the poll watching  
14 for the 2018 and 2019 elections, were -- what poll --  
15 what poll places was that by county, let's say?

16 A. Cobb County.

17 Q. Cobb County. Okay. Do you happen to  
18 remember the precinct or did you do multiple precincts?

19 A. I did multiple. The first one was at the --  
20 I don't recall.

21 Q. Okay. That's fine. But you would say you  
22 did multiple precincts though?

23 A. Yes.

24 Q. Okay. Did the training that you received for  
25 your poll watching, did that include training in



1 casting absentee ballots?

2 A. Yes. The training did go over the absentee  
3 ballot requirements.

4 Q. Okay. And did that go -- When you say  
5 absentee ballots, in Georgia we call absentee voting --

6 A. Early voting.

7 Q. -- multiple types. So was it absentee by  
8 mail or absentee in person that the training covered,  
9 if you recall?

10 A. Well, absentee -- absentee in person is  
11 the -- is -- they call it early voting.

12 Q. Uh-huh.

13 A. They went over that. And they went over  
14 in-person voting too.

15 Q. Okay. Did they provide any training related  
16 to computers?

17 A. No.

18 Q. Okay. So nothing involving hardware or  
19 programming or cybersecurity or the voting equipment  
20 itself?

21 A. No.

22 Q. Do you have any training outside of the  
23 Democratic Party of Georgia's training that might have  
24 pertained to computers?

25 A. No.

1 Q. Okay. Just to be clear, you mentioned you  
2 worked at IBM. What did you do there?

3 A. I worked in -- I did a few things, mainly  
4 administrator professional working in the business  
5 partner support organization, support for contracts --  
6 business partner contracts and administered global  
7 contracts. Business partner -- They had to -- They had  
8 to have certification, and I tracked that. Then I  
9 moved over to the compliance area, and I participated  
10 in compliance meetings from business partners around  
11 the world. And then -- Let's see. I did lots of  
12 stuff. It's just mainly in the business partners  
13 support organization, supporting business partners.

14 Q. Okay. So they wouldn't have provided you  
15 with any computer-specific training at IBM in the  
16 course of your job there?

17 A. Oh, yeah, we received a lot of training with  
18 computers there.

19 Q. Okay. Can you describe that training?

20 A. Database training, how, you know, to operate  
21 computers, just -- I mean, probably just generally how  
22 companies train their employees on how to operate  
23 computers.

24 Q. Okay. Have you had any training or education  
25 concerning operation or functioning of the direct

1 recording electronic voting machines commonly referred  
2 to as DREs?

3 A. No.

4 Q. Okay. Have you had any training or education  
5 concerning the operation or functioning of ballot  
6 marking devices commonly referred to as BMDs?

7 A. No. I mean, I've heard about them and how  
8 they operate, but I haven't received any specific  
9 training.

10 Q. Okay. And any training or education  
11 concerning the operation or functioning of the scanners  
12 that are used in conjunction with BMDs during elections  
13 here in Georgia?

14 A. No.

15 Q. Have you ever voted on a DRE?

16 A. No.

17 Q. Have you ever voted on a BMD?

18 A. Yes. Oh, wait a minute. Wait a minute. I  
19 have voted on the DRE not the BMD.

20 Q. Okay. So the voting machines that were in  
21 place up until the recent --

22 A. Exactly.

23 Q. -- changeover?

24 A. Yes, yes, exactly.

25 Q. Okay.



1 A. I get those confused.

2 Q. Do you have any writings or publications or  
3 other works of authorship relating to voting or  
4 elections?

5 A. No.

6 Q. I'm going to into your employment history,  
7 and I know that you worked at IBM. Is that where you  
8 worked right out of college?

9 A. No. I started working at IBM in 1996 -- no,  
10 sorry -- 1998.

11 Q. '98. And what jobs did you work at between  
12 college and IBM?

13 A. I was a teacher in New Jersey, and then Bill  
14 and I got married. And I started having children, so I  
15 stayed home with my children until 1996. I mean -- I'm  
16 sorry. I started -- I stayed home -- Yeah, I started  
17 working at IBM in '96.

18 Q. Okay. Not 1998?

19 A. I'm sorry. Yeah, we moved here in '96, and I  
20 started in 1998.

21 Q. Okay. Thank you. I just wanted to make sure  
22 we got that timeline right. And how long did you work  
23 at IBM for?

24 A. Until 2009.

25 Q. And was that a full-time or a part-time?



1 A. Full-time.

2 Q. Okay. And did you -- were you terminated or  
3 did you resign?

4 A. They outsourced my job to Brazil.

5 Q. Okay. And since -- After IBM, have you --  
6 have you held any other jobs?

7 A. Yes. I worked at Bright Horizons. It's a  
8 company that does children and family services for --  
9 and the one that I specifically worked at was for CNN  
10 and Turner Broadcasting.

11 Q. Okay. And when did you start there?

12 A. 2009.

13 Q. And how long did you have that job for?

14 A. I think it was six years.

15 Q. Okay. So about 2015?

16 A. Yes. And then the distance was too far to  
17 travel, so I got a job with Philadelphia Insurance  
18 Companies.

19 Q. And how long did you work at Philadelphia  
20 Insurance Companies?

21 A. I left there in -- When was that? It was  
22 about -- I think I left there in about 2018.

23 Q. What did you do there?

24 A. Administration. Office manager.

25 Q. Did you have any jobs after Philadelphia

1 Insurance?

2 A. No.

3 Q. Okay. And you're not currently working then?

4 A. No.

5 Q. Okay. In 2018 why did you -- why did you  
6 decide or did you decide to leave or were you  
7 terminated?

8 A. 2000 -- from Philadelphia?

9 Q. Yes. Sorry. Yes.

10 A. I left. I retired.

11 Q. Okay. Okay. Move on to your voter advocacy  
12 work. Can you detail what types of voter advocacy you  
13 do?

14 A. Voter advocacy that I do. I've -- Well,  
15 besides poll watching, I've written postcards to  
16 voters.

17 Q. Was that in a personal capacity or on behalf  
18 of an organization?

19 A. I went through an organization, if I can  
20 remember the name of it. It was an organization. I  
21 don't remember the name of it though.

22 Q. Okay.

23 A. They -- They sent us lists, addresses.

24 Q. And what did these postcards -- What messages  
25 did these postcards that you wrote contain?

1 A. Just reminding them of upcoming elections.

2 Q. Okay. Are you a member of any voting rights  
3 or advocacy groups currently?

4 A. Well, the Voter Protection and CGG are really  
5 the only two that -- that I am a member of.

6 Q. When you say CGG, you're talking about the  
7 Plaintiff, Coalition for Good Governance?

8 A. Yes.

9 Q. Okay. And Voter Protection, what is -- is  
10 that the full name of the organization or is it a group  
11 within --

12 A. It's the Democratic Party of Georgia.

13 Q. Uh-huh. Okay. How long have you been  
14 involved with the Georgia Coalition for Good  
15 Governance?

16 A. 2016 or '17. I don't remember the exact  
17 date. It's 2016 or 2017.

18 Q. Okay. Have you held any leadership positions  
19 within the Coalition or is it strictly just a  
20 membership?

21 A. Membership.

22 Q. Okay. Is it fair to say that your primary  
23 goal in being in -- a member of this organization is to  
24 make voting by paper ballots a reality in Georgia?

25 A. Well, that's not the only -- that's not the



1     only reason.

2           Q.     Would you -- Would you characterize it as the  
3     primary reason?

4           A.     No.

5           Q.     Okay. So what are the goals, in your mind --  
6     Let me rephrase that. What do you hope to achieve as a  
7     part of being a member of the Coalition for Good  
8     Governance?

9           A.     Well, when I realized that I was just a  
10    passive member, you know, just sitting back and waiting  
11    for things to happen, I decided to become more  
12    involved. So that's when I became a member of CGG, and  
13    they've just done a lot of educating. I've learned so  
14    much from them and -- you know, me and other members,  
15    regarding the impacts, you know, how laws impact  
16    election integrity and voting.

17           Just recently with the State Election Board rule  
18    making on the -- what was it? -- SP202, you know,  
19    just letting us know what's going on with that. They  
20    speak for me when they go to the General Assembly,  
21    and they just use their expertise. You know, I've  
22    learned so much from them regarding election law and  
23    lobbying.

24           Let's see. They create press releases to keep  
25    us involved on different public interest topics and

1 related to election integrity and reform. What else?  
2 Just a lot of educating the public, you know, that  
3 I -- I normally -- I wouldn't have any idea even  
4 where to start if it weren't for CGG. They've been  
5 very helpful.

6 Q. Okay. Would you say that a goal of yours as  
7 a member is to help ensure that voting by paper ballots  
8 becomes a reality in Georgia?

9 A. I think voting by paper ballots is very  
10 important, yes.

11 Q. Okay.

12 A. Because of the paper trail.

13 Q. Right. Understood.

14 A. Yeah.

15 Q. Have you made any statements to the media  
16 in -- that relate to Georgia's voting laws?

17 A. Relates to Georgia voting laws. Let me think  
18 now. Well, when -- when there was an election, we were  
19 doing pictures of poll tapes. And Bill and I went to  
20 photograph some poll tapes, and I got out of the car  
21 and was photographing poll tapes. And while I was  
22 photographing the poll tapes, the election manager and  
23 the election workers -- voting was finished.

24 Q. Uh-huh.

25 A. And they were bringing the equipment out --

1 Their cars were parked on the opposite end of the  
2 parking lot, so they were bringing the election  
3 equipment out. And they left election equipment by the  
4 front door or right next to me. Nobody was there. And  
5 they were all getting in their cars. Nobody watched.  
6 I could have easily taken the -- Bill was parked right  
7 there waiting for me on the sidewalk. I could have  
8 taken the equipment, put it in the car, and driven off.  
9 It was pretty alarming. So I contacted -- I contacted  
10 the news, and they came.

11 Q. And when they came --

12 A. They --

13 Q. Oh, I'm sorry.

14 A. They did a report on that.

15 Q. Okay. Did you provide any quotes for them to  
16 use in any -- any media report that they did?

17 A. The -- The reporter pulled up a document that  
18 said that the poll workers, when they were done with --  
19 with their jobs, that they were supposed to be escorted  
20 by police officers, and they were not. So that was  
21 pretty concerning.

22 Q. And is that --

23 A. It's something Gabe Sterling published.

24 Q. And so did you -- And I'm sorry to, you know,  
25 harp on this, but I want to make sure. Was this



1 something that sort of you told the media and then they  
2 printed or aired that you're aware of?

3 A. Yes. CBS46, I think it was.

4 Q. Okay.

5 A. Giovanna Drpic was the --

6 Q. I'm sorry. What was that?

7 A. Giovanna Drpic was the newscaster --

8 Q. Okay.

9 A. -- CBS46.

10 Q. And this -- I assume that you reported this  
11 to the media. Did you report any of this to a -- any  
12 county or local or state election official?

13 A. Janine Eveler.

14 Q. And who's that?

15 A. She is the Cobb County Elections Director.

16 Q. Did she provide you with any response to the  
17 report?

18 A. They said they would investigate. I never  
19 heard back after that.

20 Q. Okay. And so you didn't report it to any  
21 state election official?

22 A. No. Since it was Cobb County, I provided  
23 Janine Eveler with the information.

24 Q. Okay. Any other -- Any other times that you  
25 spoke to the media about election-related topics?

1           A.     Yes.   And I can't remember which election it  
2     was, but we have been voting absentee ever since we  
3     found out the problems about the voting machines.   And  
4     my husband and I, you know, we've always voted  
5     together.   We -- So we, you know, both -- we fill out  
6     our absentee ballots.

7           Well, his -- The yellow envelope that you mail  
8     back, his had birthdate and month and year, mine had  
9     birthdate, month, date, year.   So I just wanted to be  
10    sure that -- Well, actually, I don't think the news  
11    came that time.   I can't remember.   Yeah, I think  
12    they did.

13          So I went up to the Board of Elections to ask  
14    them, you know, if this was going to be okay.   We  
15    didn't want our ballots rejected because of that.  
16    And so I asked to speak to Janine Eveler, the  
17    Elections Director, and she came out.   Because Bill  
18    wasn't there, I was recording it so that he could  
19    hear, you know, later on I could hear that -- you  
20    know.   And so she said it would be fine.   So I went  
21    with someone else, and he had contacted the same  
22    person, Giovanna with 40 -- CBS46.   And she came and  
23    recorded what transpired after speaking with Janine.

24               (Exhibit No. 2, CBS46 News article, was  
25               marked for identification purposes.)

1 BY MR. JACOUTOT:

2 Q. Okay. I'm going to go ahead and direct your  
3 attention to your Exhibit Share and what I'm marking  
4 Defense Exhibit 2. And let me know when you have that.

5 A. Exhibit Share. Oh, I've got Exhibit 1 --  
6 Exhibit --

7 Q. You might have to back out.

8 THE CONCIERGE TECH: And Ms. Digges, if you  
9 just hit refresh up at the top or right below  
10 where it says deposition of Laura Digges,  
11 there's a Marked Exhibit folder, if you click  
12 that, it will refresh the folder for you.

13 THE WITNESS: I do not see that.

14 THE CONCIERGE TECH: It would be over on  
15 the left-hand side where it has the case name,  
16 it says, Curling, Donna. Do you see that?

17 THE WITNESS: Okay. I see it.

18 THE CONCIERGE TECH: And then if you work  
19 down, do you see where it says Deposition of  
20 Laura Digges?

21 THE WITNESS: Exhibit 2.

22 THE CONCIERGE TECH: Perfect.

23 THE WITNESS: I see "Voters question  
24 challenge accepted."

25 BY MR. JACOUTOT:



1 Q. Yeah, that looks like a pop-up. But this --  
2 This is an article from -- I'll represent to you it's  
3 an article from CBS46.com and I believe this is what  
4 you were referring to. If you want to take a quick  
5 look at it and let me know if that's the case.

6 A. We're looking at Exhibit 2; right?

7 Q. That's correct. It should be just two pages.

8 A. Challenge accepted, there are more questions  
9 surrounding the elections. Is that what we're looking  
10 at?

11 Q. Uh-huh.

12 A. Okay. I'm looking. Okay.

13 Q. Okay. Is that -- Is that article referring  
14 to the same story that you just related to me?

15 A. Yes.

16 Q. Okay. And apart from that and -- and the  
17 other experience with the CBS46 media, have you -- have  
18 you spoken to any others that you can recall?

19 A. No, not that I can recall.

20 Q. Okay. Okay. So for this next series of  
21 questions, I want to make clear that we're not asking  
22 you for any legal conclusions. We're only asking  
23 questions concerning your understanding. And since  
24 you're not a lawyer, you're not being asked to give any  
25 legal opinions or conclusions. Does that make sense?

1 A. Yes.

2 Q. Okay. What is your -- As a Plaintiff, what  
3 is your purpose in filing and proceeding with this  
4 litigation?

5 A. Well, to me, the machines aren't trustworthy.  
6 They're subject to being hacked and they're insecure.

7 Q. And based on your personal knowledge and  
8 understanding, what are the claims that you are  
9 currently making against the defendants in this  
10 lawsuit?

11 A. Well, it's on the Declarations. What  
12 specifically are you asking? I'm not sure what you're  
13 asking what my claims are.

14 Q. Well, if you have any specific claims that  
15 you are currently making against the defendants in this  
16 lawsuit, if you could describe them to me. Is it -- Is  
17 it -- And are they just related to your concerns about  
18 security of the machines?

19 A. No. I'm also concerned about absentee voting  
20 and, you know, how difficult that is sometimes. I  
21 would love to vote on the machines if I trusted them.

22 Q. Okay. Do you have any other claims that you  
23 plan on making in this case that have not yet been  
24 made?

25 A. No.

1 Q. Okay.

2 A. Just what's on the Declarations or  
3 depositions, whatever they're called.

4 Q. Understood.

5 A. Declaration, yeah.

6 Q. Okay. You've voted in numerous elections; is  
7 that correct?

8 A. Yes.

9 Q. Do you have any evidence that any of the  
10 votes you have cast in any Georgia election were not  
11 counted?

12 A. I don't know how I would prove that.

13 Q. So you don't have any evidence then, is that  
14 safe to say?

15 A. No. No. And that's the problem.

16 Q. Okay.

17 A. We just don't know. We push the button and  
18 where does my vote go?

19 Q. Okay. Do you have any evidence that any DRE  
20 used in any election in Georgia has ever actually been  
21 hacked?

22 A. The same answer, how would -- how would I  
23 know that, you know, without a paper trail? The DREs  
24 give you a bar code. That's it.

25 Q. And just to be sure, I'm referring to the --



1 A. Yeah.

2 Q. -- DREs, yeah.

3 A. The DREs, I don't know how I would know that.

4 Q. Okay. Just to be clear then, so you don't  
5 have evidence that any DREs in any election in Georgia  
6 has ever actually been hacked.

7 A. Well, I'm pretty sure during the Mueller  
8 Report there was a lot of questions whether any of them  
9 were hacked or not.

10 Q. So you would refer us to the Mueller Report  
11 for any additional -- any response then to the question  
12 I previously posed?

13 A. I just -- I just don't know how you would  
14 prove that they haven't been hacked.

15 Q. Okay. So my question is not how to prove  
16 that they haven't been hacked. My question is if you  
17 have any evidence that any DRE used in any election in  
18 Georgia has actually been hacked.

19 A. Probably refer back to the Mueller Report.

20 Q. Beyond the Mueller Report, do you have any  
21 evidence that any DRE used in any election in Georgia  
22 has actually been hacked?

23 A. No.

24 Q. Okay. Do you have any evidence that any BMD  
25 used in any election in Georgia has been hacked?

1 A. No.

2 Q. Do you have any evidence that malware was  
3 inserted in any BMD during any election in Georgia in  
4 2019, 2020, or in any election since?

5 A. We don't know that. When Logan Lamb found  
6 everything open at KSU, there's a possibility.

7 Q. So I understand that, you know, you would  
8 take the position that there's a possibility that  
9 malware was inserted, but do you have any evidence that  
10 malware was actually inserted into any BMD used in an  
11 election in Georgia since 2019?

12 A. No.

13 Q. Okay. Thank you. I'm going to turn you back  
14 to the Exhibit Share. And I haven't uploaded it yet,  
15 so just give me a moment. Okay. It's taking a moment.  
16 It's a large file.

17 (Exhibit No. 3, Coalition for Good  
18 Governance's and Coalition Plaintiffs'  
19 Objections and Responses to Defendant Brad  
20 Raffensperger's First Request for Admission, was  
21 marked for identification purposes.)

22 BY MR. JACOUTOT:

23 Q. Okay. It should be on your end now. Let me  
24 know when you pull it up. It should be marked Exhibit  
25 0003.

1 A. Okay.

2 Q. All right. So I'm going to ask that you go  
3 down to page 5, specifically, Request for Admission No.  
4 11. Let me actually start over before you do that.  
5 This is -- What I've marked here as Exhibit 3, this is  
6 the Coalition for Good Governance and Coalition  
7 Plaintiffs' Objections and Responses to Defendant Brad  
8 Raffensperger First Request for Admission; is that  
9 correct?

10 A. What page is that?

11 Q. It's on the first page. It's the title of  
12 the document.

13 A. Oh, okay.

14 Q. Just let me know that that's what you're  
15 looking at.

16 A. Yes.

17 Q. Okay. And you see here it says,  
18 additionally -- it's the fourth line down at the end,  
19 it starts, says, "Additionally, Plaintiff Megan  
20 Missett, Ricardo Davis, Laura Digges, and William  
21 Digges join in responses and objections to requests  
22 Nos. 9 through 30." Do you see that?

23 A. Yes.

24 Q. Okay. So then your responses then -- then  
25 you, Laura Digges, filed the responses here for



1 requests Nos. 9 through 30; is that correct?

2 A. 9 through 30, admit that you believe the  
3 results of the presidential election held on November  
4 30 -- November 3, 2020, in Georgia are valid.

5 Q. Oh, no. I'm sorry. That's -- Yeah, that's  
6 Request for Admission 9. I'm just trying to make sure  
7 that your responses to this document begin there,  
8 Request for Admission No. 9, and then they go through  
9 Request for Admission No. 30. I just want to make sure  
10 that that statement in the -- on the first page is  
11 accurate.

12 A. So you're asking me if the responses 1  
13 through -- oh, where does this end -- through 30 are  
14 accurate?

15 Q. No. I'm asking you if the statement on the  
16 first page where it says that, "Plaintiffs Megan  
17 Missett, Ricardo Davis, Laura Digges, and William  
18 Digges join in responses and objections to request Nos.  
19 9 through 30" --

20 A. Oh, okay.

21 Q. -- I'm asking you whether that statement is  
22 correct?

23 A. Yes.

24 Q. Okay. And so then now I want to direct your  
25 attention to Request for Admission No. 11. And it's --

1 you can go ahead and read that. Actually, I'll read it  
2 aloud for the record.

3 A. Okay.

4 Q. It says, "Admit that you have no evidence  
5 that any component of the election system was actually  
6 hacked prior to or during the elections held on  
7 November 3, 2020." And the response from Coalition,  
8 which you joined, is denied. Is that correct?

9 A. Yes.

10 Q. Okay. And now given what we just talked  
11 about, is it -- is it correct to say that you do not  
12 have any evidence that any component of the election  
13 system was actually hacked prior to or during the  
14 elections held on November 30th -- or excuse me --  
15 November 3, 2020?

16 MR. ICHTER: Bryan, let me get you to clear  
17 something up because election system is  
18 capitalized there and appears to be a defined  
19 term. Can you explain what the term means  
20 because I don't see a definition anywhere.

21 MR. JACOUTOT: I do not see a definition  
22 either. Okay. Well, I'll represent to Ms.  
23 Digges that within the election system term, it  
24 encompasses BMD -- the BMD system. And I guess  
25 my question is, is her response regarding --

1           excuse me.

2       BY MR. JACOUTOT:

3           Q.    Ms. Digges, does your response regarding the  
4       BMDs that we just spoke of, does that change in light  
5       of what you see here on the response to Request for  
6       Admission No. 11 or would you say that with respect to  
7       BMDs that you don't have any evidence that they were  
8       hacked in the elections of 2019 and 2020?

9           A.    So this says, "Admit that you have no  
10      evidence that any component of the election system was  
11      actually hacked prior to or during the election held on  
12      November 3, 2020." And we have denied that.

13          Q.    Yes. Do you -- Do you stand by that denial  
14      at this point?

15          A.    Yes.

16          Q.    Okay. Can you explain to me what evidence  
17      that you have that the election system was actually  
18      hacked prior to or during the elections held on  
19      November 3, 2020?

20               MR. ICHTER: Again, Ryan -- Bryan, we have  
21      the problem of election system is not defined.  
22      So what are we talking about?

23               MR. JACOUTOT: Well, the response is a  
24      blanket denial. It wasn't an objection based on  
25      a lack of a clear term, so I assume when this



1 was responded to that the knowledge of what  
2 election system encompassed was known.

3 MR. ICHTER: I don't know, but you're  
4 asking her questions now. Do you know what the  
5 term election system means for the purposes of  
6 giving her a fair shot and giving you an  
7 accurate answer?

8 MR. JACOUTOT: Yeah, sure. I'll -- I'll  
9 again represent that election system includes  
10 the BMDs, and my question is does she have --  
11 does this change her response that she just  
12 stated earlier that she does not have any  
13 evidence that the BMDs were actually hacked.

14 MR. ICHTER: Well, since we're talking  
15 to -- we're talking about prior to or during the  
16 elections with a focus on prior to, does  
17 election systems include the server at Kennesaw  
18 State University?

19 MR. JACOUTOT: I can't speak to that, and  
20 so I'm not asking about that in particular. I'm  
21 mostly concerned with the BMD at this point.

22 MR. ICHTER: Well, but the request for  
23 admission, it goes far beyond BMDs. It's during  
24 any election prior to November 3, 2020.

25 MR. JACOUTOT: Yeah, I understand. I'm

1 just asking whether that response affects her  
2 response -- excuse me -- whether that response  
3 to the request for admission affects her  
4 response that she just gave regarding BMDs. And  
5 if it doesn't, that's perfectly fine.

6 MR. ICHTER: Okay.

7 BY MR. JACOUTOT:

8 Q. But that's -- I guess that's my question, Ms.  
9 Digges, and I'll try to -- if you'd like me, I can try  
10 to rephrase it and kind of -- so you can, you know,  
11 answer a cleaner question.

12 MR. ICHTER: Okay.

13 BY MR. JACOUTOT:

14 Q. Okay. So in light of what we have on the  
15 response to Request for Admission No. 11, is there  
16 any -- can you think of any evidence that you have that  
17 a BMD was hacked during the 2019, 2020 elections or any  
18 since 2020?

19 A. I don't have an opinion on whether or not  
20 that's possible.

21 Q. So does it -- does it -- does it or does it  
22 not change your response that you gave me regarding  
23 BMDs?

24 A. No.

25 Q. Okay. Thank you. When did you register to

1 vote in Georgia?

2 A. 1996.

3 Q. Okay. And that was always in Cobb County,  
4 correct, always registered in Cobb County?

5 A. Yes.

6 Q. Have you ever voted in any other state?

7 A. Yes.

8 Q. And what states were that -- was that, excuse  
9 me?

10 A. Colorado, New Jersey.

11 Q. Okay. Any other states?

12 A. I'm trying to think. We lived in New York  
13 for a while, and I don't recall if we registered there.  
14 It was a short amount of time. Yes, we did. We  
15 registered in New York.

16 Q. Okay. Was the first time that you voted  
17 absentee ballot, was that -- well, let's just keep it  
18 to Georgia, your time in Georgia.

19 A. Uh-huh.

20 Q. The first time you voted by absentee ballot  
21 was in 2016; is that correct?

22 A. Let me think. 2016, yes.

23 Q. Okay. I'm going to direct you to the Exhibit  
24 Share again. Just a moment.

25 (Exhibit No. 4, ENET Report, was marked for



1 identification purposes.)

2 BY MR. JACOUTOT:

3 Q. Okay. It should be coming your way. This  
4 will be Exhibit 4.

5 A. Okay.

6 Q. Okay. So this has been marked Exhibit 4. It  
7 is your ENET voter report with partial redaction of  
8 information. And if you look down at the -- bottom  
9 of -- bottom half of the first page, can you just  
10 confirm to me where it says the date 11/08/2016,  
11 election type general, state wide, and then it says  
12 absentee; right?

13 A. Tell me the date again.

14 Q. 11/08/2016.

15 A. Okay. That's on the first page, 11/08/2016,  
16 general absentee, yes, I see it.

17 Q. And it says -- I'm sorry. It says -- Under  
18 ballot type, it says absentee; is that correct?

19 A. It does.

20 Q. Okay. So you mentioned that 2016 was the  
21 first time you voted absentee. And I believe you sort  
22 of alluded to this earlier in the deposition, but can  
23 you explain why you chose to vote by absentee in 2016.

24 A. Because I didn't trust the DREs.

25 Q. Okay. And so what evidence do you have that

1 any DRE voting machine used in any Georgia -- or excuse  
2 me. Let me rephrase that. I understand that you don't  
3 trust them, but do you have any evidence that any DRE  
4 voting machine used in the Georgia election was  
5 successfully hacked?

6 A. Well, I finally realized that when I pushed  
7 that button, I didn't know where my vote went.

8 Q. Okay.

9 A. I couldn't tell that it was counted as cast.

10 Q. Do you know how many times you've cast an  
11 absentee ballot?

12 A. I've casted an absentee ballot in every  
13 election that I've voted in since then.

14 Q. Okay. And you've never voted on a BMD; is  
15 that correct?

16 A. That's correct.

17 Q. And you do not have any plans to ever vote on  
18 a BMD in the future; is that correct?

19 A. That's correct.

20 Q. Okay. Now, I've asked you about whether  
21 you've been deposed before and whether you've been  
22 examined at trial. But have you -- Sort of apart from  
23 those questions, have you ever given any declarations  
24 in any case other than in this particular one?

25 A. No.

1 Q. Okay. Have you read -- Are you familiar with  
2 Dr. Halderman?

3 A. I am.

4 Q. Okay. And he's an expert in this case;  
5 right?

6 A. Yes.

7 Q. Have you read his report on findings in the  
8 Georgia Dominion BMD system in this case?

9 A. I was at the -- the hearing that he  
10 attended --

11 Q. Uh-huh.

12 A. -- that he was a witness for, so I've heard  
13 his -- his -- his declaration, his witness statements.

14 Q. Okay. But you didn't read his report or  
15 anything; is that correct?

16 A. I may have. I don't recall.

17 Q. Okay. Have you -- Have you discussed with  
18 Dr. Halderman or any other expert their findings in --  
19 or excuse me -- their findings concerning the Dominion  
20 BMD system?

21 A. I have not discussed it, no.

22 Q. Okay. Has anybody explained to you what's  
23 contained in Dr. Halderman's report on the Georgia  
24 Dominion voting system?

25 A. Well, Dr. Halderman has when I listened to



1 his -- to his witness statement during the hearing.  
2 And then I have read some of it, but it's been a --  
3 it's been a long time. I don't recall.

4 Q. And this would have -- So this would have  
5 been -- You said that this was a long time ago. Would  
6 it have been a couple of years ago?

7 A. Yes.

8 Q. Okay. So it wouldn't have been this year;  
9 correct?

10 A. No.

11 Q. Okay.

12 MR. ICHTER: We'll stipulate that if it was  
13 a couple of years ago, it wasn't this year.

14 MR. JACOUTOT: Thank you.

15 MR. ICHTER: You're welcome.

16 BY MR. JACOUTOT:

17 Q. Just a moment, Ms. Digges, I'm just going  
18 through my exhibits here.

19 MR. JACOUTOT: Actually, why don't we take  
20 a five-minute break if that's okay with  
21 everybody.

22 THE WITNESS: Okay.

23 MR. JACOUTOT: Okay. Court reporter, we  
24 can go ahead and go off the record until 2:40  
25 we'll come back.

1 (A short break was taken from 2:34 p.m. to  
2 2:42 p.m.)

3 BY MR. JACOUTOT:

4 Q. Okay. Ms. Digges, I've got a series of  
5 questions here to ask you, change gears a little bit.  
6 Let's see. Well, not too much though. Okay. Do you  
7 have any evidence that the results of any election held  
8 in Georgia on November 3, 20 -- excuse me -- November  
9 3, 2020, were actually changed in any way as a result  
10 of hacking or the insertion of malware into any  
11 component of the election system?

12 A. Well, I rely on the experts to say that  
13 they're risky and hackable. That's who I rely on.

14 Q. Understood. I'm just asking if you have any  
15 evidence yourself that the results of the election held  
16 in Georgia on November 3rd were actually changed --  
17 November 3, 2020?

18 A. No.

19 Q. Okay. Do you contend that the election  
20 system malfunctioned in any way in connection with the  
21 November 3, 2020, election?

22 MR. ICHTER: When you say election system,  
23 what are you referring to?

24 MR. JACOUTOT: The -- All parts of the  
25 Georgia election apparatus.

1 BY THE WITNESS:

2 A. Well, some of the machines weren't  
3 functioning. The pollbooks weren't functioning.

4 Q. Do you contend that -- So excuse me. Let me  
5 start over. So you said some of the machines and  
6 pollbooks malfunctioned; is that correct?

7 A. That's correct.

8 Q. Do you contend that the result of those  
9 malfunctions changed the election outcome in any way?

10 A. I don't know that.

11 Q. Do you have any evidence that any votes in  
12 the presidential election held on November 3, 2020, in  
13 Georgia were actually switched from President Donald J.  
14 Trump to Joseph R. Biden, Jr. as a result of the  
15 software anomaly in the election system?

16 A. Can you repeat that please?

17 Q. Yeah, absolutely. Do you have any evidence  
18 that any of the votes in the presidential election held  
19 on November 3, 2020, in Georgia were actually switched  
20 from President Donald J. Trump to Joseph R. Biden as  
21 the result of a software anomaly used in the election  
22 system?

23 A. Well, I have heard of people going to cast  
24 their votes and, when they pressed one, it switched to  
25 the other.



1 Q. Do you know who those people are?

2 A. I don't know them personally.

3 Q. Did they tell you directly or did you -- were  
4 you informed through someone else?

5 A. They told -- Well, I'm in a Facebook group,  
6 and they -- I was monitoring what was going on,  
7 especially during the -- was it the presidential? Was  
8 it the presidential election? And people were  
9 reporting that that happened to them.

10 Q. Did that happen to you?

11 A. No. Because I vote -- I vote -- I vote  
12 absentee.

13 Q. Okay. Just making sure. So the -- So you  
14 received information through a Facebook group that some  
15 people's votes were switched from Donald Trump to  
16 Joseph Biden?

17 A. Yes, in Cobb County.

18 Q. Do you remember the name of that Facebook  
19 group?

20 A. I don't.

21 Q. Okay. Do you have any evidence apart from  
22 the comments on the Facebook group that, during the  
23 presidential election held on November 3, 2020, that  
24 votes were actually switched from President -- excuse  
25 me -- from Joe Biden to Donald Trump?

1           A.     Some were switched. I don't know which  
2     was -- which to what.

3           Q.     Okay. Do you contend that this -- the -- and  
4     excuse me. Let me -- Let me rephrase. You said some  
5     were switched. How do you know that?

6           A.     They were posting. I was monitoring it. And  
7     Cobb County was having 11-hour wait times, and people  
8     were posting how long they were -- it was taking to  
9     vote. And some people were saying that their -- their  
10    votes were switched, and then they had the election  
11    manager come over and help them.

12          Q.     Okay. And to be clear, you don't remember  
13    the names of any of these people?

14          A.     I don't.

15          Q.     And these weren't reported directly to you.  
16    They just went to a Facebook --

17          A.     Exactly.

18          Q.     -- a public Facebook group.

19          A.     Exactly.

20          Q.     Okay.

21          A.     People were posting their experiences.

22          Q.     Gotcha. And do you have any evidence that  
23    these experiences being posted about vote switching  
24    were the result of an anomaly in the software used in  
25    the election system?

1 A. I have no opinion on that. I don't know.

2 Q. And so you don't have any evidence on that?

3 A. Other than what they said.

4 Q. Okay. And do you have any evidence that  
5 these alleged vote switchings reported in the Facebook  
6 groups were the results of an algorithm or other design  
7 feature of the election system?

8 A. I have no knowledge of that.

9 Q. Okay. And do you have any evidence that the  
10 alleged vote switching reported in the Facebook group  
11 was the result of any problem of any kind with any  
12 component of the election system?

13 A. I have no knowledge of that.

14 Q. Okay. And we talked about the presidential  
15 race, but do you -- did this -- do you have evidence  
16 that the votes in any other elections held on the  
17 ballot on November 3, 2020, were switched?

18 A. The 2018 gubernatorial election.

19 Q. I'm just referring to November 3, 2020.

20 A. Oh, no. Can you repeat that, please? I'm  
21 sorry.

22 Q. Sure. So the other allegations of vote  
23 switching that we just previously discussed involved  
24 the presidential election on November 3rd of 2020, the  
25 race for president. But my question is: Do you have



1 any evidence that any votes in any other election on  
2 the ballot on November 3, 2020, were actually switched?

3 A. No.

4 Q. Okay. Do you have any evidence of any  
5 widespread voter fraud in Georgia in connection with  
6 the elections held in Georgia on November 3, 2020?

7 A. No.

8 Q. Do you have any -- Excuse me. Do you have  
9 any evidence of any malfunctions of any component of  
10 the election system that impacted the outcome of the  
11 presidential election held in Georgia on November 3,  
12 2020?

13 A. I don't know.

14 Q. You don't know if you have any evidence or  
15 you don't have any evidence? I can rephrase the -- or  
16 repeat the question if it helps. Do you have any  
17 evidence of any malfunctions of any component of the  
18 election system that impacted the outcome of the  
19 presidential election in Georgia on November 3, 2020?

20 A. I don't know.

21 Q. Can you clarify whether you don't know if you  
22 have evidence or if you just -- or if you do not have  
23 evidence?

24 A. I don't have evidence.

25 Q. Okay. And so I'm going to ask the same

1 question, but instead of just with respect to the  
2 presidential election, my question is: Do you have any  
3 evidence of any malfunctions of any component in the  
4 election system that impacted the outcome of any of the  
5 other elections on the ballot in -- on the November 3,  
6 2020, election?

7 A. I don't know.

8 Q. Do you -- Can you confirm whether you have  
9 any evidence or not or whether you don't know if you  
10 have any evidence?

11 A. Whether I don't have any evidence or don't --

12 Q. Yeah. When you say I don't know, do you mean  
13 that you do not have any evidence or that you simply  
14 know whether you have evidence?

15 A. I don't have any evidence.

16 Q. Okay. Do you have any evidence that election  
17 system failed to count any legal votes in the  
18 presidential election on November 3, 2020, in Georgia?

19 A. No.

20 Q. Okay. Do you have any evidence that the  
21 election system failed to count any legal votes in any  
22 of the other elections held in Georgia on November 3,  
23 2020?

24 A. No.

25 Q. Do you have any evidence that the election

1 system counted any illegal votes in any of the  
2 elections held in 2020 -- excuse me -- on November 3,  
3 2020? And I can -- I can ask that again because it  
4 sounds a lot like the questions I've just been asking,  
5 but it's a different -- a different question.

6 A. Yeah, yeah. If you don't mind asking it  
7 again --

8 Q. Sure.

9 A. -- it would be great.

10 Q. Do you have any evidence that the election  
11 system counted any illegal votes in any of the  
12 elections held in Georgia on November 3, 2020?

13 A. Whether they counted any illegal votes. I  
14 don't know that.

15 Q. So you don't have any evidence that any  
16 illegal votes were counted.

17 A. I don't know that. I'm going to leave that  
18 up to the experts.

19 Q. That's fine. But I do need a more firm  
20 answer, not that you don't know that it occurred, but  
21 I'm asking you whether you have any evidence that it  
22 occurred. And if you don't have evidence that it  
23 occurred, that's fine.

24 A. Well, I know they were photographing the poll  
25 tapes. I don't know exactly what came out of that, so



1 the end of it is, I don't know.

2 Q. So I know that you don't know whether illegal  
3 votes were counted. That's fine. But do you have any  
4 evidence that any illegal votes were counted in the  
5 November 3, 2020?

6 A. I have no evidence.

7 Q. Okay. And you're not contesting the outcome  
8 of the presidential election held in Georgia on  
9 November 2020; is that correct?

10 A. That's correct.

11 Q. And you're not contesting the outcome of any  
12 other elections held in Georgia on November 3, 2020; is  
13 that correct, and to clarify, any non-presidential  
14 elections held during that race -- or during the  
15 election on November 3, 2020?

16 A. No.

17 Q. Okay. Do you have any evidence that there  
18 was any mismatch between the QR codes on the paper  
19 ballots cast in the presidential election held in  
20 Georgia on November 3, 2020, and the human readable  
21 portion of the paper ballots?

22 A. How would I know that?

23 Q. So you don't have any evidence?

24 A. No.

25 Q. Okay.

1 A. That's the problem.

2 Q. Yeah. Understood. I've got a few more lines  
3 like this, so. Do you have any evidence that any vote  
4 that you cast in any Georgia election was changed?

5 A. No.

6 Q. Do you have any evidence that your vote in  
7 the -- Well, let me rephrase that. And so -- Strike  
8 that question. Sorry.

9 Do you have any evidence that your vote cast in  
10 the 2020 presidential election was not counted?

11 A. No.

12 Q. Can you explain how you've personally been  
13 injured by the use of DREs in Georgia elections, if at  
14 all?

15 A. Well, I like to vote, you know, with my  
16 community on election day, and because I don't trust  
17 them, I vote absentee. My husband and I have always  
18 made it a priority. We always vote together. We  
19 brought our kids, you know, to vote. And we don't  
20 trust them, so, you know, we just don't do that  
21 anymore. We vote absentee.

22 Q. Okay. And you said you don't trust them. So  
23 are you concerned that if you were to decide to vote on  
24 a BMD that something might occur that would affect the  
25 accuracy of that vote being tallied?

1 A. Yes.

2 Q. Do you know -- Do you have anything  
3 specifically that you're concerned of that might occur?

4 A. Well, the bar code -- I can't read bar codes,  
5 so that in itself, I can't tell if my vote was counted  
6 as cast.

7 Q. Can you read the human readable portion of  
8 the paper printout from your vote?

9 A. I can, except that I don't know if that's  
10 reflected in the BRD that is read.

11 Q. So a concern that you have is that the QR  
12 code may not -- there might be something that occurs  
13 that causes the QR code not to match up to the human  
14 readable portion?

15 A. Yes.

16 Q. Okay. Anything else that you're concerned  
17 that might happen?

18 A. Well, the jumbotron screens can be seen by  
19 people walking by. They know how you vote. That's a  
20 concern. You know, I don't want my neighbors knowing  
21 how I voted.

22 Q. And, you know, I'm just realizing we sort of,  
23 like, eased into concerns about BMDs, and my question  
24 was related to DREs. So I guess the portions that we  
25 were talking about regarding QR code and the human



1 readable portion and the screens, those all refer to  
2 the BMDs; is that correct?

3 A. That's correct.

4 Q. Is there anything that you're concerned about  
5 with respect to the DREs that might happen if you voted  
6 on them, you know, back when you -- back when they were  
7 in service?

8 A. Well, yeah, we don't vote on those anymore.  
9 But when we did, like I said before, you push the  
10 button and you don't know if your vote is counted  
11 correctly.

12 Q. Okay.

13 A. You don't know if it's counted as cast.  
14 There's no -- There was no paper trail, no way to tell.

15 Q. Now, would you -- would you say that your  
16 concerns here are shared more generally by the voting  
17 population of Georgia or are they specific to you?

18 A. I don't know. I mean, I know how I feel. I  
19 know how my family feels, but, you know -- and my  
20 friends feel that way. But I don't know how the  
21 general population feels.

22 Q. Well --

23 A. I mean, that's pretty vague. I don't --

24 Q. -- putting -- putting aside that, yeah, you  
25 don't know how the general population --

1           A.    I mean, I don't go to Kroger and ask people  
2    what they think about the voting machine.

3           Q.    Sure, sure. But, yeah, putting that aside,  
4    the concerns that you have, though, about what might go  
5    wrong on these machines, are those -- if those were to  
6    occur, would those be -- would those be -- would the  
7    out -- would the results of those occurrences be  
8    detrimental in a unique way to you or would they be --  
9    would that be detrimental generally speaking to Georgia  
10   voters?

11          A.    That would be detrimental to Georgia voters.

12          Q.    Okay. Okay. Okay. Changing gears, have you  
13   made any written statements to a political party or  
14   voter advocacy group concerning this case or your  
15   allegations in this case?

16          A.    I don't recall. I don't know.

17          Q.    Okay. And that was with respect to written  
18   statements, so I'm going to ask the same question but  
19   with respect to verbal statements. Have you made any  
20   verbal statements to a political party or voter  
21   advocacy group concerning this case or your allegations  
22   in this case?

23          A.    I'm trying to think, my -- my concerns. I've  
24   spoken to Janine Eveler about my concerns, yes.

25          Q.    Okay.

1           A.    I've gone to board meetings and voiced my  
2    concerns.

3           Q.    Okay. Do you know if any other plaintiffs in  
4    this case have given any statements to political  
5    parties or voter advocacy groups regarding the case?

6           A.    I don't know.

7           Q.    Okay. Are you aware of anyone -- I know you  
8    haven't used a BMD, but are you aware of anyone who  
9    voted on a BMD whose vote was not counted?

10          A.    My daughter and son-in-law live in Nashville,  
11    and they voted on the BMD. And they said the same  
12    thing I did that, you know, the bar code is what's  
13    reading my vote, how do I know.

14          Q.    And that was in a Tennessee election, though;  
15    is that correct?

16          A.    That's the Tennessee election.

17          Q.    Okay. Are you aware of anyone who voted on a  
18    BMD whose vote on the actual screen did not match the  
19    paper ballot, human readable portion?

20          A.    I don't know.

21          Q.    Okay. To your knowledge, have your attorneys  
22    received payment for their service in this case from  
23    you or anyone else?

24          A.    I don't know.

25          Q.    To your knowledge, have your attorneys



1 received payment for their services -- and that's --  
2 scratch -- strike that.

3 MR. JACOUTOT: Okay. That is all I have,  
4 Ms. Digges. Thank you for your time.  
5 Appreciate it. Cary, I don't know if you have  
6 any follow-up you'd like to do.

7 MR. ICHTER: No questions from me.

8 MR. JACOUTOT: Okay. Well, then I think  
9 I'm done. I appreciate it, Ms. Digges.

10 THE WITNESS: Thank you.

11 (The deposition in the above-entitled  
12 matter was concluded at approximately 3:04 p.m.)  
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## C E R T I F I C A T E

STATE OF GEORGIA )

COUNTY OF FAYETTE )

I, CHARLENE M. HANSARD, Certified Court Reporter, State of Georgia, do hereby certify that the foregoing pages were reported by me via speech recognition and reduced to print by me personally or under my direct supervision and is a true, complete and correct transcript of the aforesaid proceedings reported by me.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties; that I am not a relative or employee of attorney or counsel for any of said parties; nor am I financially interested in the outcome of the action.

This certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done by the undersigned certified court reporter and original signature and seal is attached thereto. This the 3rd day of October, 2021.



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CHARLENE M. HANSARD, CCR, CVR-M  
Certificate No. B-2341

## D I S C L O S U R E

I, Charlene M. Hansard, do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I was contacted by the party taking the proceedings to provide court reporting services for this proceeding and there is no contract that is prohibited by O.C.G.A. Section 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board for the taking of this proceeding.

There is no contract to provide reporting services between myself or any person with whom I have a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond my usual and customary rates have been disclosed and offered to all parties.

DATED: September 23, 2021.



CHARLENE M. HANSARD, CCR-B-2341



1 To:

2 Cary Ichter, Esq.  
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6 Re: Signature of Deponent

7 Date Errata due back at our offices: 30 days

8 Greetings:

9  
10 The deponent has reserved the right to read and sign.  
Please have the deponent review the attached PDF  
11 transcript, noting any changes or corrections on the  
attached PDF Errata. The deponent may fill out the  
12 Errata electronically or print and fill out manually.

13 Once the Errata is signed by the deponent and  
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## 1 ERRATA

2 I, the undersigned, do hereby certify that I have  
3 read the transcript of my testimony, and that

4 \_\_\_\_ There are no changes noted.

5 \_\_\_\_ The following changes are noted:

6 Pursuant to Rule 30(7)(e) of the Federal Rules of  
7 Civil Procedure and/or OCGA 9-11-30(e), any changes  
8 in form or substance which you desire to make to your  
9 testimony shall be entered upon the deposition with a  
10 statement of the reasons given for making them. To  
11 assist you in making any such corrections, please use  
12 the form below. If additional pages are necessary,  
13 please furnish same and attach.

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25

Curling, Donna v. Raffensperger, Brad

Page 64

1 Page \_\_\_\_\_ Line \_\_\_\_\_ Change \_\_\_\_\_

2

3 Reason for change \_\_\_\_\_

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Page \_\_\_\_\_ Line \_\_\_\_\_ Change \_\_\_\_\_

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18 Reason for change \_\_\_\_\_

19

20 LAURA MARIE DIGGES

21

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before me this \_\_\_\_ day

22

of \_\_\_\_\_, \_\_\_\_\_.

23

24 NOTARY PUBLIC

25

My Commission Expires: \_\_\_\_\_



[&amp; - admit]

Page 1

|  |   |   |   |
|--|---|---|---|
| <b>&amp;</b>   | <b>2019</b> 15:9,14 33:4<br>33:11 37:8 39:17  | <b>30th</b> 36:14   | <b>a</b>  |
| <b>&amp; 2:7</b>   | <b>202</b> 2:9  | <b>33</b> 4:13  | <b>absentee</b> 16:1,2,5<br>16:5,7,8,10,10<br>27:2,6 30:19<br>40:17,20 41:12,16<br>41:18,21,23 42:11<br>42:12 47:12 54:17<br>54:21  |
| <b>0</b>   | <b>2020</b> 33:4 35:4<br>36:7,15 37:8,12,19<br>38:24 39:17,18<br>45:9,17,21 46:12<br>46:19 47:23 49:17<br>49:19,24 50:2,6,12<br>50:19 51:6,18,23<br>52:2,3,12 53:5,9<br>53:12,15,20 54:10   | <b>3340</b> 2:13 62:3<br><b>343-9696</b> 62:23<br><b>3478</b> 11:19<br><b>3:04</b> 59:12<br><b>3rd</b> 45:16 49:24<br>60:21   | <b>absolutely</b> 46:17<br><b>acceptable</b> 8:15<br><b>accepted</b> 28:24<br>29:8<br><b>accuracy</b> 6:4<br>54:25<br><b>accurate</b> 35:11,14<br>38:7<br><b>achieve</b> 23:6<br><b>action</b> 1:6 60:15<br>61:15,15,16,17,18<br>61:19<br><b>active</b> 12:12<br><b>actual</b> 58:18<br><b>additional</b> 32:11<br>63:8<br><b>additionally</b> 34:18<br>34:19<br><b>address</b> 11:18<br><b>addresses</b> 21:23<br><b>administered</b> 5:16<br>17:6<br><b>administration</b><br>14:21,22 20:24<br><b>administrator</b><br>17:4<br><b>admission</b> 4:15<br>33:20 34:3,8 35:6<br>35:8,9,25 37:6<br>38:23 39:3,15<br><b>admit</b> 35:2 36:4<br>37:9 |
| <b>0001</b> 11:8<br><b>0003</b> 33:25  | <b>2021</b> 1:16 5:8<br>60:21 61:22<br><b>2100</b> 2:8<br><b>23</b> 1:16 5:8 61:22<br><b>2341</b> 1:15 60:24<br>61:24<br><b>27</b> 4:12<br><b>2989</b> 1:7<br><b>2:34</b> 45:1<br><b>2:42</b> 45:2  | <b>4</b><br><b>4</b> 4:16 40:25 41:4<br>41:6<br><b>40</b> 4:16 27:22<br><b>400</b> 2:19<br><b>4038</b> 3:6<br><b>404</b> 2:14 3:7 62:4<br><b>434-6868</b> 2:20  |   |
| <b>1</b>   | <b>3</b> 4:13 33:17 34:5<br>35:4 36:7,15<br>37:12,19 38:24<br>45:8,9,17,21 46:12<br>46:19 47:23 49:17<br>49:19 50:2,6,11,19<br>51:5,18,22 52:2,12<br>53:5,12,15,20<br><b>30</b> 34:22 35:1,2,4,9<br>35:13,19 62:7<br>63:5<br><b>300</b> 62:21<br><b>30066</b> 1:17 11:20<br><b>30076</b> 62:22<br><b>30303</b> 3:6<br><b>30326</b> 2:14 62:4<br><b>30339</b> 2:19 | <b>5</b><br><b>5</b> 34:3<br><b>6</b><br><b>6</b> 4:5<br><b>612-0286</b> 3:7<br><b>7</b><br><b>7</b> 63:5<br><b>7.c.</b> 61:9<br><b>770</b> 2:20 62:23<br><b>8</b><br><b>869-7600</b> 2:14<br>62:4<br><b>9</b><br><b>9</b> 34:22 35:1,2,6,8<br>35:19<br><b>9-11-28</b> 5:5<br><b>9-11-30</b> 63:6<br><b>900</b> 2:8<br><b>926-6976</b> 2:9<br><b>96</b> 19:17,19<br><b>98</b> 19:11 |   |
| <b>1 4:11 10:24 11:1</b><br>11:5 28:5 35:12<br><b>10.b.</b> 61:3<br><b>11</b> 4:11 34:4 35:25<br>37:6 39:15 48:7<br><b>11/08/2016</b> 41:10<br>41:14,15<br><b>141</b> 3:6<br><b>15-14-37</b> 61:9<br><b>1530</b> 2:13 62:3<br><b>1600</b> 2:18<br><b>17</b> 22:16<br><b>17076</b> 60:22 61:23<br><b>1971</b> 12:24<br><b>1973</b> 13:6<br><b>1996</b> 11:23 19:9,15<br>40:2<br><b>1998</b> 19:10,18,20<br><b>1:17</b> 1:7<br><b>1:29</b> 5:9 |   |   |   |
| <b>2</b>   |   |   |   |
| <b>2</b> 4:12 27:24 28:4<br>28:21 29:6<br><b>20</b> 45:8 62:21<br><b>2000</b> 21:8<br><b>20037</b> 2:8<br><b>2009</b> 19:24 20:12<br><b>2015</b> 20:15<br><b>2016</b> 22:16,17<br>40:21,22 41:20,23<br><b>2017</b> 22:17<br><b>2018</b> 15:7,14 20:22<br>21:5 49:18  |   |   |   |



|   |   |   |   |
|---|---|---|---|
| <b>advocacy</b> 21:11,12<br>21:14 22:3 57:14<br>57:21 58:5<br><b>affect</b> 54:24<br><b>affirmative</b> 3:23<br><b>aforesaid</b> 60:9<br><b>afternoon</b> 5:6<br><b>agency</b> 61:14<br><b>agent</b> 61:17<br><b>ago</b> 44:5,6,13<br><b>agree</b> 6:23 8:8<br><b>agreeable</b> 8:4,21<br><b>ahead</b> 8:20 10:22<br>10:23 11:15 28:2<br>36:1 44:24<br><b>aired</b> 26:2<br><b>al</b> 1:4,7<br><b>alarming</b> 25:9<br><b>algorithm</b> 49:6<br><b>allegations</b> 49:22<br>57:15,21<br><b>alleged</b> 49:5,10<br><b>allendale</b> 12:21<br><b>allowed</b> 5:21<br><b>alluded</b> 41:22<br><b>aloud</b> 36:2<br><b>alphonsus</b> 13:3<br><b>amount</b> 40:14<br><b>anomaly</b> 46:15,21<br>48:24<br><b>answer</b> 7:1 8:15<br>8:20 10:14 31:22<br>38:7 39:11 52:20<br><b>anybody</b> 43:22<br><b>anymore</b> 54:21<br>56:8<br><b>apart</b> 9:10 14:15<br>29:16 42:22 47:21<br><b>apparatus</b> 45:25<br><b>appeared</b> 2:3 | <b>appears</b> 36:18<br><b>appreciate</b> 59:5,9<br><b>approximate</b><br>12:22<br><b>approximately</b> 5:9<br>59:12<br><b>area</b> 17:9<br><b>arrangements</b><br>61:19<br><b>arrested</b> 12:7<br><b>article</b> 4:12 27:24<br>29:2,3,13 61:3,9<br><b>aside</b> 56:24 57:3<br><b>asked</b> 8:12 12:1<br>27:16 29:24 42:20<br><b>asking</b> 7:21 29:21<br>29:22 30:12,13<br>35:12,15,21 38:4<br>38:20 39:1 45:14<br>52:4,6,21<br><b>assembly</b> 23:20<br><b>assist</b> 63:8<br><b>assistant</b> 13:22<br><b>assume</b> 12:9 26:10<br>37:25<br><b>atlanta</b> 1:2 2:14,19<br>3:6 62:4<br><b>attach</b> 63:9<br><b>attached</b> 4:19,20<br>60:21 62:10,11<br><b>attend</b> 9:23 12:17<br>12:25 13:18<br><b>attendance</b> 10:4<br>12:23 13:5<br><b>attended</b> 43:10<br><b>attention</b> 6:2 28:3<br>35:25<br><b>attorney</b> 3:5 9:6<br>10:8 60:12,13<br>61:15,17 62:15 | <b>attorneys</b> 9:3<br>58:21,25<br><b>authorship</b> 19:3<br><b>aware</b> 26:2 58:7,8<br>58:17<br><b>b</b><br><b>b</b> 1:15 60:24 61:9<br>61:24<br><b>back</b> 23:10 26:19<br>27:8 28:7 32:19<br>33:13 44:25 56:6<br>56:6 62:7<br><b>background</b> 12:17<br><b>ballot</b> 16:3 18:5<br>40:17,20 41:18<br>42:11,12 49:17<br>50:2 51:5 58:19<br><b>ballots</b> 16:1,5<br>22:24 24:7,9 27:6<br>27:15 53:19,21<br><b>bar</b> 31:24 55:4,4<br>58:12<br><b>based</b> 8:13 30:7<br>37:24<br><b>bear</b> 10:25<br><b>behalf</b> 2:6,11,16<br>3:3 21:17<br><b>believe</b> 29:3 35:2<br>41:21<br><b>best</b> 7:18,19<br><b>better</b> 8:10<br><b>beyond</b> 32:20<br>38:23 61:20<br><b>biden</b> 46:14,20<br>47:16,25<br><b>bill</b> 19:13 24:19<br>25:6 27:17<br><b>birthdate</b> 27:8,9<br><b>bit</b> 45:5<br><b>bjacoutot</b> 2:20 | <b>blanket</b> 37:24<br><b>bmd</b> 18:17,19<br>32:24 33:3,10<br>36:24,24 38:21<br>39:17 42:14,18<br>43:8,20 54:24<br>58:8,9,11,18<br><b>bmds</b> 18:6,12 37:4<br>37:7 38:10,13,23<br>39:4,23 55:23<br>56:2<br><b>board</b> 23:17 27:13<br>58:1 61:4,10<br><b>bottom</b> 41:8,9<br><b>brad</b> 1:7 4:14 5:20<br>33:19 34:7<br><b>brazil</b> 20:4<br><b>brd</b> 55:10<br><b>break</b> 3:23 8:16,21<br>44:20 45:1<br><b>bright</b> 20:7<br><b>bring</b> 9:17,19<br><b>bringing</b> 24:25<br>25:2<br><b>broadcasting</b><br>20:10<br><b>brought</b> 54:19<br><b>bryan</b> 2:17 6:12<br>36:16 37:20<br><b>burton</b> 2:17<br><b>business</b> 17:4,6,7<br>17:10,12,13<br><b>button</b> 31:17 42:7<br>56:10<br><b>c</b><br><b>c</b> 2:1 3:1 5:1 11:19<br>60:1,1 61:1<br><b>call</b> 16:5,11<br><b>called</b> 31:3<br><b>capacity</b> 21:17 |
|---|---|---|---|



|  |  |   |  |
|--|--|---|--|
| <b>capitalized</b> 36:18<br><b>car</b> 24:20 25:8<br><b>cars</b> 25:1,5<br><b>cary</b> 2:12 10:19<br>59:5 62:2<br><b>case</b> 6:14 9:11,24<br>28:15 29:5 30:23<br>42:24 43:4,8<br>57:14,15,21,22<br>58:4,5,22<br><b>cast</b> 31:10 42:9,10<br>46:23 53:19 54:4<br>54:9 55:6 56:13<br><b>casted</b> 42:12<br><b>casting</b> 16:1<br><b>causes</b> 55:13<br><b>cbs46</b> 4:12 26:3,9<br>27:22,24 29:17<br><b>cbs46.com</b> 29:3<br><b>ccr</b> 60:23 61:24<br><b>certificate</b> 60:24<br><b>certification</b> 13:23<br>17:8 60:16<br><b>certifications</b><br>13:20 14:1,2<br><b>certified</b> 1:15 60:4<br>60:19<br><b>certify</b> 60:5,11<br>63:2<br><b>cgg</b> 22:4,6 23:12<br>24:4<br><b>challenge</b> 28:24<br>29:8<br><b>change</b> 37:4 38:11<br>39:22 45:5 63:10<br>63:12,13,15,16,18<br>63:19,21,22,24<br>64:1,3,4,6,7,9,10<br>64:12,13,15,16,18<br><b>changed</b> 45:9,16<br>46:9 54:4 | <b>changeover</b> 18:23<br><b>changes</b> 62:10<br>63:3,4,6<br><b>changing</b> 57:12<br><b>characterize</b> 23:2<br><b>charged</b> 12:4<br><b>charlene</b> 1:14 5:7<br>60:4,23 61:2,24<br><b>chastain</b> 11:19<br><b>cheryl</b> 3:4<br><b>cheryl.ringer</b> 3:7<br><b>childhood</b> 13:11<br>13:15<br><b>children</b> 19:14,15<br>20:8<br><b>chose</b> 41:23<br><b>cichter</b> 2:15 62:5<br><b>circle</b> 2:18<br><b>civil</b> 1:6 5:22 63:6<br><b>claims</b> 30:8,13,14<br>30:22<br><b>clarify</b> 50:21<br>53:13<br><b>cleaner</b> 39:11<br><b>clear</b> 17:1 29:21<br>32:4 36:16 37:25<br>48:12<br><b>clearly</b> 7:19<br><b>click</b> 28:11<br><b>cnn</b> 20:9<br><b>coalition</b> 3:10 4:13<br>4:13 22:7,14,19<br>23:7 33:17,18<br>34:6,6 36:7<br><b>cobb</b> 11:22 15:16<br>15:17 26:15,22<br>40:3,4 47:17 48:7<br><b>code</b> 31:24 55:4,12<br>55:13,25 58:12<br><b>codes</b> 53:18 55:4 | <b>college</b> 12:25 13:3<br>19:8,12<br><b>colorado</b> 40:10<br><b>come</b> 44:25 48:11<br><b>coming</b> 41:3<br><b>commencing</b> 1:15<br><b>comments</b> 47:22<br><b>commission</b> 64:25<br><b>commonly</b> 18:1,6<br><b>community</b> 54:16<br><b>companies</b> 17:22<br>20:18,20<br><b>company</b> 20:8<br><b>complete</b> 3:22<br>60:8<br><b>completed</b> 62:19<br><b>compliance</b> 13:25<br>17:9,10<br><b>complied</b> 5:3<br><b>component</b> 36:5<br>36:12 37:10 45:11<br>49:12 50:9,17<br>51:3<br><b>computer</b> 9:9<br>17:15<br><b>computers</b> 16:16<br>16:24 17:18,21,23<br><b>concern</b> 55:11,20<br><b>concerned</b> 30:19<br>38:21 54:23 55:3<br>55:16 56:4<br><b>concerning</b> 17:25<br>18:5,11 25:21<br>29:23 43:19 57:14<br>57:21<br><b>concerns</b> 30:17<br>55:23 56:16 57:4<br>57:23,24 58:2<br><b>concierge</b> 3:11<br>28:8,14,18,22 | <b>concluded</b> 59:12<br><b>conclusions</b> 29:22<br>29:25<br><b>conference</b> 5:13<br><b>confirm</b> 11:10<br>41:10 51:8<br><b>confuse</b> 8:7<br><b>confused</b> 19:1<br><b>conjunction</b> 18:12<br><b>connection</b> 45:20<br>50:5<br><b>contacted</b> 25:9,9<br>27:21 61:5<br><b>contain</b> 21:25<br><b>contained</b> 1:13<br>43:23<br><b>contend</b> 45:19<br>46:4,8 48:3<br><b>contesting</b> 53:7,11<br><b>continued</b> 3:1<br><b>continuity</b> 3:23<br><b>contract</b> 61:8,12<br><b>contracts</b> 17:5,6,7<br><b>conversations</b> 9:3<br><b>convicted</b> 12:9<br><b>copies</b> 4:21 9:8,22<br>62:15<br><b>copy</b> 4:20<br><b>correct</b> 13:13 29:7<br>31:7 34:9 35:1,22<br>36:8,11 40:4,21<br>41:18 42:15,16,18<br>42:19 43:15 44:9<br>46:6,7 53:9,10,13<br>56:2,3 58:15 60:9<br><b>corrections</b> 62:10<br>63:8<br><b>correctly</b> 56:11<br><b>council</b> 61:5<br><b>counsel</b> 5:11 6:17<br>6:23 60:12,14 |
|--|--|---|--|



|  |   |   |  |
|--|---|---|--|
| <b>count</b> 51:17,21<br><b>counted</b> 31:11<br>42:9 52:1,11,13,16<br>53:3,4 54:10 55:5<br>56:10,13 58:9<br><b>county</b> 3:3,5,5<br>11:22 15:15,16,17<br>26:12,15,22 40:3,4<br>47:17 48:7 60:3<br><b>couple</b> 44:6,13<br><b>course</b> 17:16<br><b>court</b> 1:1,15 5:3,6<br>5:7,17,23,25 7:25<br>44:23 60:4,20<br>61:4,6 62:18,21<br><b>covered</b> 16:8<br><b>create</b> 23:24<br><b>crime</b> 12:5,9<br><b>cross</b> 12:1<br><b>curling</b> 1:4 2:6 7:7<br>28:16<br><b>current</b> 11:18<br><b>currently</b> 21:3<br>22:3 30:9,15<br><b>customary</b> 61:20<br><b>cv</b> 1:7<br><b>cvr</b> 60:23<br><b>cybersecurity</b><br>16:19 | <b>davis</b> 2:12 34:20<br>35:17 62:2<br><b>day</b> 54:16 60:21<br>64:21<br><b>days</b> 62:7<br><b>dburton</b> 2:21<br><b>deal</b> 7:18<br><b>decide</b> 21:6,6<br>54:23<br><b>decided</b> 23:11<br><b>declaration</b> 31:5<br>43:13<br><b>declarations</b> 9:8<br>9:10,22 30:11<br>31:2 42:23<br><b>defendant</b> 1:8<br>4:14 5:19 33:19<br>34:7<br><b>defendant's</b> 4:8<br><b>defendants</b> 2:16<br>3:3 6:13 30:9,15<br><b>defense</b> 28:4<br><b>defined</b> 36:18<br>37:21<br><b>definition</b> 36:20<br>36:21<br><b>degree</b> 13:12,15<br><b>democratic</b> 14:14<br>14:20 16:23 22:12<br><b>denial</b> 37:13,24<br><b>denied</b> 36:8 37:12<br>60:17<br><b>deponent</b> 62:6,9<br>62:10,11,12,18<br><b>deposed</b> 9:24<br>42:21<br><b>deposition</b> 1:11,14<br>4:11,20 5:18 6:3<br>6:18 7:2,11 9:2,5<br>9:18,20 10:5,8,25<br>11:1,11,25 28:10 | 28:19 41:22 59:11<br>63:7<br><b>depositions</b> 10:1<br>31:3<br><b>describe</b> 17:19<br>30:16<br><b>description</b> 4:10<br><b>design</b> 49:6<br><b>desire</b> 63:6<br><b>detail</b> 21:12<br><b>detrimental</b> 57:8,9<br>57:11<br><b>devices</b> 18:6<br><b>different</b> 23:25<br>52:5,5<br><b>difficult</b> 7:22<br>30:20<br><b>digges</b> 1:12 2:11<br>4:4 5:19 6:7,14,16<br>7:11 28:8,10,20<br>34:20,21,25 35:17<br>35:18 36:23 37:3<br>39:9 44:17 45:4<br>59:4,9 64:20<br><b>direct</b> 10:22 17:25<br>28:2 35:24 40:23<br>60:8<br><b>directly</b> 47:3<br>48:15<br><b>director</b> 3:10<br>26:15 27:17<br><b>disassembly</b> 60:17<br>60:18<br><b>disclose</b> 61:2<br><b>disclosed</b> 61:21<br><b>discovery</b> 5:21<br><b>discussed</b> 43:17,21<br>49:23<br><b>distance</b> 20:16<br><b>distancing</b> 5:10 | <b>district</b> 1:1,2<br><b>division</b> 1:2<br><b>document</b> 25:17<br>34:12 35:7<br><b>documents</b> 9:11<br>9:21<br><b>doing</b> 7:15 15:13<br>24:19<br><b>dominion</b> 43:8,19<br>43:24<br><b>donald</b> 46:13,20<br>47:15,25<br><b>donna</b> 1:4 28:16<br><b>door</b> 25:4<br><b>dr</b> 43:2,18,23,25<br><b>dre</b> 18:15,19 31:19<br>32:17,21 42:1,3<br><b>dres</b> 18:2 31:23<br>32:2,3,5 41:24<br>54:13 55:24 56:5<br><b>driven</b> 25:8<br><b>drpic</b> 26:5,7<br><b>due</b> 5:9 62:7<br><b>duly</b> 6:8<br><b>duma</b> 2:18 |
| <b>d</b>   |   |   | <b>e</b>   |
| <b>d</b> 4:2 5:1,5 61:1<br><b>d.c.</b> 2:8<br><b>dal</b> 2:17<br><b>database</b> 17:20<br><b>date</b> 5:8 22:17<br>27:9 41:10,13<br>62:7<br><b>dated</b> 61:22<br><b>dates</b> 12:22 13:5<br><b>daughter</b> 58:10   |   |   | <b>e</b> 2:1,1 3:1,1 4:2<br>5:1,1 60:1,1 61:1<br>63:5,6<br><b>earlier</b> 6:13 10:5<br>38:12 41:22<br><b>early</b> 13:11,15<br>16:6,11<br><b>eased</b> 55:23<br><b>easier</b> 8:1<br><b>easily</b> 25:6<br><b>educating</b> 23:13<br>24:2<br><b>education</b> 13:11<br>13:11,16 14:1,4,7<br>14:9,16 17:24  |



|  |  |   |  |
|--|--|---|--|
| 18:4,10<br><b>educational</b> 12:17<br><b>either</b> 36:22<br><b>election</b> 14:8,16,21<br>14:22 15:7 23:16<br>23:17,22 24:1,18<br>24:22,23 25:2,3<br>26:12,21,25 27:1<br>31:10,20 32:5,17<br>32:21,25 33:3,4,11<br>35:3 36:5,12,17,23<br>37:10,11,17,21<br>38:2,5,9,17,24<br>41:11 42:4,13<br>45:7,11,15,19,21<br>45:22,25 46:9,12<br>46:15,18,21 47:8<br>47:23 48:10,25<br>49:7,12,18,24 50:1<br>50:10,11,18,19<br>51:2,4,6,16,18,21<br>51:25 52:10 53:8<br>53:15,19 54:4,10<br>54:16 58:14,16<br><b>elections</b> 15:3,14<br>18:12 19:4 22:1<br>26:15 27:13,17<br>29:9 31:6 36:6,14<br>37:8,18 38:16<br>39:17 49:16 50:6<br>51:5,22 52:2,12<br>53:12,14 54:13<br><b>electronic</b> 18:1<br><b>electronically</b><br>62:11<br><b>elson</b> 2:7 7:5,5,9<br><b>employee</b> 60:12,13<br><b>employees</b> 17:22<br><b>employment</b> 19:6<br><b>encompassed</b> 38:2 | <b>encompasses</b><br>36:24<br><b>enet</b> 4:16 40:25<br>41:7<br><b>english</b> 2:18<br><b>ensure</b> 6:4 24:7<br><b>entered</b> 63:7<br><b>entitled</b> 59:11<br><b>envelope</b> 27:7<br><b>equipment</b> 16:19<br>24:25 25:3,3,8<br><b>errata</b> 62:7,11,11<br>62:12,14,16,17,19<br>63:1<br><b>escorted</b> 25:19<br><b>especially</b> 47:7<br><b>esq</b> 2:7,12,17,17<br>3:4 62:2<br><b>et</b> 1:4,7<br><b>eveler</b> 26:13,23<br>27:16 57:24<br><b>everybody</b> 44:21<br><b>evidence</b> 31:9,13<br>31:19 32:5,17,21<br>32:24 33:2,9 36:4<br>36:12 37:7,10,16<br>38:13 39:16 41:25<br>42:3 45:7,15<br>46:11,17 47:21<br>48:22 49:2,4,9,15<br>50:1,4,9,14,15,17<br>50:22,23,24 51:3,9<br>51:10,11,13,14,15<br>51:16,20,25 52:10<br>52:15,21,22 53:4,6<br>53:17,23 54:3,6,9<br><b>exact</b> 3:22 22:16<br><b>exactly</b> 3:21 18:22<br>18:24 48:17,19<br>52:25 | <b>examination</b> 4:5<br>6:10<br><b>examined</b> 6:8<br>11:25 12:1 42:22<br><b>excuse</b> 36:14 37:1<br>39:2 40:8 42:1<br>43:19 45:8 46:4<br>47:24 48:4 50:8<br>52:2<br><b>executive</b> 3:10<br><b>exhibit</b> 4:9,11,12<br>4:13,16 10:23,24<br>11:1,5,6,7 27:24<br>28:3,4,5,5,6,11,21<br>29:6 33:14,17,24<br>34:5 40:23,25<br>41:4,6<br><b>exhibits</b> 4:8,19<br>44:18<br><b>experience</b> 29:17<br><b>experiences</b> 48:21<br>48:23<br><b>expert</b> 43:4,18<br><b>expertise</b> 23:21<br><b>experts</b> 45:12<br>52:18<br><b>expires</b> 64:25<br><b>explain</b> 36:19<br>37:16 41:23 54:12<br><b>explained</b> 43:22<br><b>expressly</b> 60:16<br><b>f</b><br><b>f</b> 60:1<br><b>facebook</b> 47:5,14<br>47:18,22 48:16,18<br>49:5,10<br><b>facility</b> 62:20<br><b>fact</b> 6:3<br><b>failed</b> 51:17,21<br><b>fair</b> 22:22 38:6 | <b>familiar</b> 43:1<br><b>family</b> 20:8 56:19<br><b>far</b> 20:16 38:23<br><b>fayette</b> 60:3<br><b>feature</b> 49:7<br><b>federal</b> 5:22 63:5<br><b>feel</b> 56:18,20<br><b>feels</b> 56:19,21<br><b>file</b> 1:6 33:16<br>62:15<br><b>filed</b> 34:25 62:17<br><b>filing</b> 30:3<br><b>fill</b> 27:5 62:11,11<br><b>finally</b> 42:6<br><b>financial</b> 61:16,18<br>61:19<br><b>financially</b> 60:14<br><b>findings</b> 43:7,18<br>43:19<br><b>fine</b> 7:3 15:21<br>27:20 39:5 52:19<br>52:23 53:3<br><b>finished</b> 24:23<br><b>firm</b> 52:19<br><b>first</b> 4:15 6:8 7:1<br>15:19 33:20 34:8<br>34:11 35:10,16<br>40:16,20 41:9,15<br>41:21<br><b>five</b> 44:20<br><b>focus</b> 38:16<br><b>foerster</b> 2:7 7:6<br><b>folder</b> 28:11,12<br><b>follow</b> 59:6<br><b>following</b> 63:4<br><b>follows</b> 6:9<br><b>foregoing</b> 60:6,18<br><b>form</b> 6:25 63:6,8<br><b>forward</b> 62:15<br><b>found</b> 27:3 33:5 |
|--|--|---|--|



|  |  |   |   |
|--|--|---|---|
| <b>fourth</b> 34:18<br><b>fraud</b> 50:5<br><b>friends</b> 56:20<br><b>front</b> 25:4<br><b>full</b> 6:15 19:25<br>20:1 22:10<br><b>fully</b> 8:24<br><b>fulton</b> 3:3,5<br><b>fultoncountyg...</b><br>3:7<br><b>functioning</b> 17:25<br>18:5,11 46:3,3<br><b>furnish</b> 63:9<br><b>further</b> 60:11<br><b>future</b> 42:18  | <b>getting</b> 25:5<br><b>giovanna</b> 26:5,7<br>27:22<br><b>give</b> 11:18 14:20<br>29:24 31:24 33:15<br><b>given</b> 36:10 42:23<br>58:4 63:7<br><b>giving</b> 38:6,6<br><b>global</b> 17:6<br><b>go</b> 8:20 10:22,23<br>11:15 15:2 16:2,4<br>23:20 28:2 31:18<br>34:2 35:8 36:1<br>44:24,24 57:1,4<br><b>goal</b> 22:23 24:6<br><b>goals</b> 23:5<br><b>goes</b> 38:23<br><b>going</b> 6:24 10:22<br>10:23 11:4 12:16<br>19:6 23:19 27:14<br>28:2 33:13 34:2<br>40:23 44:17 46:23<br>47:6 50:25 52:17<br>57:18<br><b>good</b> 3:10 4:13 5:6<br>22:7,14 23:7<br>33:17 34:6<br><b>gotcha</b> 48:22<br><b>governance</b> 3:10<br>22:7,15 23:8 34:6<br><b>governance's</b> 4:13<br>33:18<br><b>government's</b> 5:10<br><b>graduate</b> 13:18<br><b>graduated</b> 12:24<br>13:6,13<br><b>graduation</b> 13:8<br><b>great</b> 6:2,17 7:4,8<br>11:14 52:9<br><b>greetings</b> 62:8 | <b>group</b> 22:10 47:5<br>47:14,19,22 48:18<br>49:10 57:14,21<br><b>groups</b> 22:3 49:6<br>58:5<br><b>gubernatorial</b><br>15:7 49:18<br><b>guess</b> 36:24 39:8<br>55:24   | 46:12,18 47:23<br>49:16 50:6,11<br>51:22 52:2,12<br>53:8,12,14,19<br><b>help</b> 24:7 48:11<br><b>helpful</b> 24:5<br><b>helps</b> 50:16<br><b>helson</b> 2:9<br><b>hiccups</b> 7:17<br><b>high</b> 12:17,20 13:7<br><b>highlands</b> 12:20<br><b>history</b> 19:6<br><b>hit</b> 28:9<br><b>home</b> 19:15,16<br><b>hope</b> 23:6<br><b>horizons</b> 20:7<br><b>hour</b> 48:7<br><b>huh</b> 3:23 7:24 9:7<br>16:12 22:13 24:24<br>29:11 40:19 43:11<br><b>human</b> 53:20 55:7<br>55:13,25 58:19<br><b>husband</b> 27:4<br>54:17<br><b>husband's</b> 10:5 |
| <b>g</b>   |  | <b>h</b>  | <b>i</b>  |
| <b>g</b> 5:1<br><b>ga</b> 62:22<br><b>gabe</b> 25:23<br><b>gears</b> 45:5 57:12<br><b>general</b> 23:20<br>41:11,16 56:21,25<br><b>generally</b> 17:21<br>56:16 57:9<br><b>georgia</b> 1:2,17<br>2:14,19 3:6 11:20<br>14:14,20,21 16:5<br>18:13 22:12,14,24<br>24:8,17 31:10,20<br>32:5,18,21,25 33:3<br>33:11 35:4 40:1<br>40:18,18 42:1,4<br>43:8,23 45:8,16,25<br>46:13,19 50:5,6,11<br>50:19 51:18,22<br>52:12 53:8,12,20<br>54:4,13 56:17<br>57:9,11 60:2,5<br>61:5 62:4<br><b>georgia's</b> 16:23<br>24:16 |  | <b>h</b> 11:19<br><b>hackable</b> 45:13<br><b>hacked</b> 30:6 31:21<br>32:6,9,14,16,18,22<br>32:25 36:6,13<br>37:8,11,18 38:13<br>39:17 42:5<br><b>hacking</b> 45:10<br><b>halderman</b> 43:2<br>43:18,25<br><b>halderman's</b><br>43:23<br><b>half</b> 41:9<br><b>hand</b> 28:15<br><b>hannah</b> 2:7 7:5<br><b>hansard</b> 1:14 5:7<br>60:4,23 61:2,24<br><b>happen</b> 7:22 15:17<br>23:11 47:10 55:17<br>56:5<br><b>happened</b> 47:9<br><b>hardware</b> 16:18<br><b>harp</b> 25:25<br><b>head</b> 7:24<br><b>hear</b> 27:19,19<br><b>heard</b> 18:7 26:19<br>43:12 46:23<br><b>hearing</b> 43:9 44:1<br><b>held</b> 20:6 22:18<br>35:3 36:6,14<br>37:11,18 45:7,15 | <b>ibm</b> 13:25 17:2,15<br>19:7,9,12,17,23<br>20:5<br><b>ichter</b> 2:12,12 5:15<br>6:5,20 7:3 10:10<br>10:14,16,20 36:16<br>37:20 38:3,14,22<br>39:6,12 44:12,15<br>45:22 59:7 62:2,2<br><b>ichterdavis.com</b><br>2:15 62:5<br><b>idea</b> 24:3<br><b>identification</b> 11:2<br>27:25 33:21 41:1  |



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Page 7

|   |  |   |  |
|---|--|---|--|
| <b>illegal</b> 52:1,11,13<br>52:16 53:2,4<br><b>impact</b> 23:15<br><b>impacted</b> 50:10,18<br>51:4<br><b>impacts</b> 23:15<br><b>important</b> 24:10<br><b>improperly</b> 8:8<br><b>include</b> 15:25<br>38:17<br><b>includes</b> 38:9<br><b>information</b> 26:23<br>41:8 47:14<br><b>informed</b> 47:4<br><b>injured</b> 54:13<br><b>insecure</b> 30:6<br><b>inserted</b> 33:3,9,10<br><b>insertion</b> 45:10<br><b>insurance</b> 20:17<br>20:20 21:1<br><b>integrity</b> 23:16<br>24:1<br><b>interest</b> 23:25<br>61:16,18<br><b>interested</b> 60:15<br><b>interesting</b> 7:14<br><b>internal</b> 14:1<br><b>investigate</b> 26:18<br><b>involved</b> 22:14<br>23:12,25 49:23<br><b>involving</b> 16:18 | 44:23 45:3,24<br>59:3,8<br><b>janine</b> 26:13,23<br>27:16,23 57:24<br><b>jersey</b> 12:21 13:4<br>19:13 40:10<br><b>job</b> 17:16 20:4,13<br>20:17<br><b>jobs</b> 19:11 20:6,25<br>25:19<br><b>joe</b> 47:25<br><b>join</b> 34:21 35:18<br><b>joined</b> 36:8<br><b>joseph</b> 46:14,20<br>47:16<br><b>jr</b> 46:14<br><b>judicial</b> 61:5<br><b>jumbotron</b> 55:18   | 52:20,24,25 53:1,2<br>53:2,22 54:15,19<br>54:20 55:2,9,19,20<br>55:22 56:6,10,13<br>56:18,18,19,19,20<br>56:25 57:16 58:3<br>58:6,7,12,13,20,24<br>59:5<br><b>knowing</b> 55:20<br><b>knowledge</b> 8:13<br>30:7 38:1 49:8,13<br>58:21,25<br><b>known</b> 38:2<br><b>groger</b> 57:1<br><b>ksu</b> 33:6   | <b>legal</b> 29:22,25<br>51:17,21<br><b>legend</b> 3:20<br><b>letting</b> 23:19<br><b>licenses</b> 13:20<br><b>light</b> 37:4 39:14<br><b>line</b> 34:18 63:10<br>63:13,16,19,22<br>64:1,4,7,10,13,16<br><b>lines</b> 54:2<br><b>listened</b> 43:25<br><b>lists</b> 21:23<br><b>litigation</b> 30:4<br><b>little</b> 8:1,9 10:11<br>45:5<br><b>live</b> 58:10<br><b>lived</b> 11:22 40:12<br><b>llc</b> 2:12 62:2<br><b>llp</b> 2:7,18<br><b>loaded</b> 9:9<br><b>lobbying</b> 23:23<br><b>local</b> 26:12<br><b>located</b> 1:17<br><b>logan</b> 33:5<br><b>long</b> 11:21 19:22<br>20:13,19 22:13<br>44:3,5 48:8<br><b>look</b> 9:11 29:5<br>41:8<br><b>looked</b> 9:14<br><b>looking</b> 29:6,9,12<br>34:15<br><b>looks</b> 11:13 29:1<br><b>lot</b> 17:17 23:13<br>24:2 25:2 32:8<br>52:4<br><b>lots</b> 17:11<br><b>loudly</b> 7:19 10:11<br><b>love</b> 30:21<br><b>lynn</b> 11:19 |
| <b>j</b> 46:13,20<br><b>jacoutot</b> 2:17 4:5<br>5:14,18 6:1,11,12<br>6:23 7:4,8,10<br>10:17,19,21 11:3<br>28:1,25 33:22<br>36:21 37:2,23<br>38:8,19,25 39:7,13<br>41:2 44:14,16,19   | <b>k</b><br><b>keep</b> 7:23 8:24<br>23:24 40:17<br><b>kennesaw</b> 38:17<br><b>kids</b> 54:19<br><b>kind</b> 8:17 39:10<br>49:11<br><b>know</b> 7:20,25 8:9<br>8:15,18 9:25 11:5<br>11:24 14:10 15:2<br>17:20 19:7 23:10<br>23:14,15,18,19,21<br>24:2 25:24 27:4,5<br>27:14,19,20 28:4<br>29:5 30:20 31:12<br>31:17,23,23 32:3,3<br>32:13 33:5,7,24<br>34:14 38:3,4<br>39:10 42:7,10<br>46:10 47:1,2 48:1<br>48:5 49:1 50:13<br>50:14,20,21 51:7,9<br>51:12,14 52:14,17 | <b>l</b><br><b>l</b> 2:8 61:1<br><b>lack</b> 37:25<br><b>lake</b> 13:3<br><b>lamb</b> 33:5<br><b>lane</b> 11:19<br><b>large</b> 33:16<br><b>laura</b> 1:11 4:4<br>5:19 6:7,16 10:10<br>28:10,20 34:20,25<br>35:17 64:20<br><b>law</b> 14:8,9,17<br>23:22 58:10 61:15<br>61:17<br><b>laws</b> 23:15 24:16<br>24:17<br><b>lawsuit</b> 30:10,16<br><b>lawsuits</b> 12:12,12<br>12:14<br><b>lawyer</b> 29:24<br><b>leadership</b> 22:18<br><b>learned</b> 23:13,22<br><b>leave</b> 21:6 52:17<br><b>left</b> 20:21,22 21:10<br>25:3 28:15 |  |



[m - okay]

Page 8

| m  | 56:18,23 57:1                                       | n  | 51:22 52:2,12                                     |
|--|---|--|---|
| <b>m</b> 1:14 60:4,23,23<br>61:2,24              | <b>means</b> 36:19 38:5<br><b>media</b> 24:15 25:16 | <b>n</b> 2:1 3:1 4:2 5:1<br>11:19                  | 53:5,9,12,15,20<br><b>number</b> 4:10             |
| <b>machine</b> 42:1,4<br>57:2                    | 26:1,11,25 29:17<br><b>medical</b> 13:22            | <b>n.e.</b> 2:13 62:3<br><b>name</b> 5:7 6:12,15   | <b>numerous</b> 31:6                              |
| <b>machines</b> 18:1,20<br>27:3 30:5,18,21       | <b>medications</b> 8:23<br><b>meet</b> 6:14         | 14:5 21:20,21<br>22:10 28:15 47:18                 | <b>o</b>  |
| 46:2,5 57:5<br><b>mail</b> 16:8 27:7             | <b>meetings</b> 17:10<br>58:1                       | <b>names</b> 48:13<br><b>nashville</b> 58:10       | <b>o</b> 5:1 61:1<br><b>o.c.g.a.</b> 5:4 61:8     |
| 62:13<br><b>making</b> 23:18 30:9                | <b>megan</b> 34:19<br>35:16                         | <b>necessary</b> 63:8<br><b>need</b> 8:14,16,17    | <b>oath</b> 5:16<br><b>objection</b> 5:12,14      |
| 30:15,23 47:13<br>63:7,8                         | <b>member</b> 22:2,5,23<br>23:7,10,12 24:7          | 10:10 52:19<br><b>negative</b> 3:24                | <b>objections</b> 4:14<br>6:24 33:19 34:7         |
| <b>malfunctioned</b><br>45:20 46:6               | <b>members</b> 23:14<br><b>membership</b>           | <b>neighbors</b> 55:20<br><b>never</b> 11:24 12:9  | 34:21 35:18<br><b>obviously</b> 7:14 9:6          |
| <b>malfunctions</b> 46:9<br>50:9,17 51:3         | 22:20,21<br><b>mentioned</b> 17:1                   | 26:18 42:14<br><b>new</b> 12:21 13:3               | 9:13<br><b>occur</b> 54:24 55:3                   |
| <b>malware</b> 33:2,9,10<br>45:10                | 41:20<br><b>messages</b> 21:24                      | 19:13 40:10,12,15<br><b>news</b> 4:12 25:10        | 57:6<br><b>occurred</b> 52:20,22                  |
| <b>manager</b> 20:24<br>24:22 48:11              | <b>mind</b> 6:15 23:5<br>52:6                       | 27:10,24<br><b>newscaster</b> 26:7                 | 52:23<br><b>occurrences</b> 57:7                  |
| <b>mansell</b> 62:21<br><b>manually</b> 62:11    | <b>mine</b> 27:8<br><b>minute</b> 18:18,18          | <b>nodding</b> 7:24<br><b>non</b> 53:13            | <b>occurs</b> 55:12<br><b>ocga</b> 63:6           |
| <b>marie</b> 1:12 4:4 6:7<br>6:16 64:20          | 44:20<br><b>mismatch</b> 53:18                      | <b>normally</b> 24:3<br><b>northeast</b> 11:20     | <b>october</b> 60:21<br><b>offered</b> 61:21      |
| <b>marietta</b> 1:17<br>11:20                    | <b>missett</b> 2:11 34:20<br>35:17                  | <b>northern</b> 1:2<br>12:20                       | <b>office</b> 3:5 13:22<br>20:24                  |
| <b>marilyn</b> 3:10<br><b>mark</b> 10:24         | <b>mofo.com</b> 2:9<br><b>moment</b> 10:25          | <b>nos</b> 34:22 35:1,18<br><b>notarized</b> 62:13 | <b>officers</b> 25:20<br><b>offices</b> 62:7,13   |
| <b>marked</b> 4:19 11:2<br>11:5 27:25 28:11      | 33:15,15 40:24<br>44:17                             | <b>notary</b> 64:24<br><b>noted</b> 63:3,4         | <b>official</b> 26:12,21<br><b>oh</b> 13:12 17:17 |
| 33:21,24 34:5<br>40:25 41:6                      | <b>monitoring</b> 47:6<br>48:6                      | <b>notice</b> 4:11 10:24<br>11:1,11                | 18:18 25:13 28:5<br>34:13 35:5,13,20<br>49:20     |
| <b>marking</b> 18:6 28:3<br><b>marks</b> 3:10    | <b>month</b> 27:8,9<br><b>morrison</b> 2:7 7:6      | <b>noting</b> 62:10<br><b>november</b> 35:3,4      | <b>okay</b> 6:1,2,12,22<br>7:8,14 8:23 9:2,10     |
| <b>married</b> 19:14<br><b>match</b> 55:13 58:18 | <b>move</b> 21:11<br><b>moved</b> 17:9 19:19        | 36:7,14,15 37:12<br>37:19 38:24 45:8               | 9:17,23 10:7,16,18<br>11:4,9,10,14,21             |
| <b>matter</b> 59:12<br><b>matthew</b> 3:11       | <b>mueller</b> 32:7,10,19<br>32:20                  | 45:8,16,17,21<br>46:12,19 47:23                    | 12:4,11,16 13:10<br>13:12,18,24 14:4,7            |
| <b>mean</b> 9:13 17:21<br>18:7 19:15 51:12       | <b>multiple</b> 15:18,19<br>15:22 16:7              | 49:17,19,24 50:2,6<br>50:11,19 51:5,18             | 14:15,19,25 15:13<br>15:17,21,24 16:4             |



[okay - precinct]

Page 9

|   |   |  |   |
|---|---|--|---|
| 16:15,18 17:1,14<br>17:19,24 18:4,10<br>18:20,25 19:18,21<br>20:2,5,11,15 21:3<br>21:5,11,11,22 22:2<br>22:9,13,18,22 23:5<br>24:6,11 25:15<br>26:4,8,20,24 27:14<br>28:2,17 29:12,12<br>29:13,16,20,20<br>30:2,22 31:1,6,16<br>31:19 32:4,15,24<br>33:13,15,23 34:1<br>34:13,17,24 35:20<br>35:24 36:3,10,22<br>37:16 39:6,12,14<br>39:25 40:3,11,16<br>40:23 41:3,5,6,15<br>41:20,25 42:8,14<br>42:20 43:1,4,14,17<br>43:22 44:8,11,20<br>44:22,23 45:4,6,19<br>47:13,21 48:3,12<br>48:20 49:4,9,14<br>50:4,25 51:16,20<br>53:7,17,25 54:22<br>55:16 56:12 57:12<br>57:12,12,17,25<br>58:3,7,17,21 59:3<br>59:8<br>once 62:12<br>open 33:6<br>operate 17:20,22<br>18:8<br>operation 17:25<br>18:5,11<br>opinion 39:19 49:1<br>opinions 29:25<br>opposed 7:24<br>opposite 25:1 | order 5:10<br>ordering 62:16<br>organization 17:5<br>17:13 21:18,19,20<br>22:10,23<br>original 4:20<br>60:20 62:15,17<br>originally 4:19<br>outcome 46:9<br>50:10,18 51:4<br>53:7,11 60:15<br>outside 16:22<br>outsourced 20:4<br><br><b>p</b><br><br>p 2:1,1 3:1,1 5:1<br>p.m. 1:16 5:2,9<br>45:1,2 59:12<br>page 4:3,10 34:3<br>34:10,11 35:10,16<br>41:9,15 63:10,13<br>63:16,19,22 64:1,4<br>64:7,10,13,16<br>pages 29:7 60:6<br>63:8<br>paper 22:24 24:7,9<br>24:12 31:23 53:18<br>53:21 55:8 56:14<br>58:19<br>parked 25:1,6<br>parking 25:2<br>parkwood 2:18<br>part 19:25 23:7<br>partial 41:7<br>participated 17:9<br>participating 8:25<br>particular 38:20<br>42:24<br>parties 2:3 58:5<br>60:12,14 61:21<br>62:16 | partner 17:5,6,7<br>partners 17:10,12<br>17:13<br>parts 45:24<br>party 12:11,14<br>14:14,20 16:23<br>22:12 57:13,20<br>61:6,15,16,17,18<br>passive 23:10<br>pay 6:1<br>payment 58:22<br>59:1<br>pdf 62:10,11<br>peachtree 2:13<br>62:3<br>people 46:23 47:1<br>47:8 48:7,9,13,21<br>55:19 57:1<br>people's 47:15<br>perfect 8:6 28:22<br>perfectly 8:15<br>39:5<br>person 16:8,10,14<br>27:22 61:13<br>personal 8:13<br>21:17 30:7<br>personally 47:2<br>54:12 60:7<br>pertained 16:24<br>philadelphia<br>20:17,19,25 21:8<br>phonetic 3:22<br>photocopying<br>60:17,19<br>photograph 24:20<br>photographing<br>24:21,22 52:24<br>phrased 8:8<br>pictures 24:19<br>place 15:10 18:21 | places 15:15<br>plaintiff 1:5 2:6<br>22:7 30:2 34:19<br>plaintiffs 2:11<br>4:13 7:7 9:24<br>33:18 34:7 35:16<br>58:3<br>plan 30:23<br>plans 42:17<br>please 7:19,23<br>46:16 49:20 62:10<br>62:13,19 63:8,9<br>pleasure 6:14<br>point 37:14 38:21<br>police 25:20<br>political 57:13,20<br>58:4<br>poll 14:10,12,25<br>15:1,2,11,13,14,15<br>15:25 21:15 24:19<br>24:20,21,22 25:18<br>52:24<br>pollbooks 46:3,6<br>polling 15:10<br>pop 29:1<br>population 56:17<br>56:21,25<br>portion 53:21 55:7<br>55:14 56:1 58:19<br>portions 55:24<br>posed 8:19 32:12<br>position 33:8<br>positions 22:18<br>possibility 33:6,8<br>possible 39:20<br>postcards 21:15<br>21:24,25<br>posted 48:23<br>posting 48:6,8,21<br>precinct 15:18 |
|---|---|--|---|



|  |   |  |  |
|--|---|--|--|
| <b>precincts</b> 15:18,22<br><b>preparation</b> 9:12<br>9:13,16<br><b>prepare</b> 9:5<br><b>preparing</b> 9:2<br><b>present</b> 3:9<br><b>presenting</b> 7:6<br><b>president</b> 46:13,20<br>47:24 49:25<br><b>presidential</b> 35:3<br>46:12,18 47:7,8,23<br>49:14,24 50:11,19<br>51:2,18 53:8,13,19<br>54:10<br><b>press</b> 23:24<br><b>pressed</b> 46:24<br><b>pretty</b> 25:9,21<br>32:7 56:23<br><b>previously</b> 32:12<br>49:23<br><b>primary</b> 22:22<br>23:3<br><b>principal</b> 61:14<br><b>print</b> 60:7 62:11<br><b>printed</b> 9:8 26:2<br><b>printout</b> 55:8<br><b>prior</b> 12:14 36:6<br>36:13 37:11,18<br>38:15,16,24<br><b>priority</b> 54:18<br><b>probably</b> 15:9<br>17:21 32:19<br><b>problem</b> 31:15<br>37:21 49:11 54:1<br><b>problems</b> 27:3<br><b>procedure</b> 5:22<br>63:6<br><b>proceeding</b> 30:3<br>61:7,11<br><b>proceedings</b> 60:9<br>61:6 | <b>produced</b> 4:21<br><b>production</b> 62:20<br><b>professional</b> 17:4<br><b>programming</b><br>16:19<br><b>prohibited</b> 61:8<br><b>protection</b> 14:11<br>22:4,9<br><b>prove</b> 31:12 32:14<br>32:15<br><b>provide</b> 16:15<br>25:15 26:16 61:6<br>61:12<br><b>provided</b> 17:14<br>26:22<br><b>pryor</b> 3:6<br><b>public</b> 23:25 24:2<br>48:18 64:24<br><b>publications</b> 19:2<br><b>published</b> 25:23<br><b>pull</b> 33:24<br><b>pulled</b> 25:17<br><b>purpose</b> 5:20 8:6<br>30:3<br><b>purposes</b> 5:21<br>11:2 27:25 33:21<br>38:5 41:1<br><b>pursuant</b> 1:12<br>61:3 63:5<br><b>push</b> 31:17 56:9<br><b>pushed</b> 42:6<br><b>put</b> 11:15 25:8<br><b>putting</b> 56:24,24<br>57:3 | 49:25 50:16 51:1<br>51:2 52:5 54:8<br>55:23 57:18<br><b>questions</b> 8:14<br>11:14 12:2 29:8<br>29:21,23 32:8<br>38:4 42:23 45:5<br>52:4 59:7<br><b>quick</b> 29:4<br><b>quiet</b> 10:12<br><b>quotes</b> 25:15   | <b>received</b> 11:12<br>13:25 14:2,10,19<br>15:24 17:17 18:8<br>47:14 58:22 59:1<br><b>recognition</b> 60:7<br><b>record</b> 5:11 6:15<br>11:16 36:2 44:24<br><b>recorded</b> 27:23<br><b>recording</b> 18:1<br>27:18<br><b>redaction</b> 41:7<br><b>reduced</b> 60:7<br><b>refer</b> 32:10,19<br>56:1<br><b>referred</b> 18:1,6<br><b>referring</b> 29:4,13<br>31:25 45:23 49:19<br><b>reflected</b> 55:10<br><b>reform</b> 24:1<br><b>refresh</b> 11:7 28:9<br>28:12<br><b>regarding</b> 23:15<br>23:22 36:25 37:3<br>39:4,22 55:25<br>58:5<br><b>regional</b> 12:20<br><b>register</b> 39:25<br><b>registered</b> 40:4,13<br>40:15<br><b>regulations</b> 61:4<br>61:10<br><b>rejected</b> 27:15<br><b>relate</b> 24:16<br><b>related</b> 16:15 24:1<br>26:25 29:14 30:17<br>55:24<br><b>relates</b> 24:17<br><b>relating</b> 19:3<br><b>relationship</b> 61:14<br><b>relative</b> 60:11,13 |
|  | <b>q</b>  | <b>r</b>   |  |
|  | <b>qr</b> 53:18 55:11,13<br>55:25<br><b>question</b> 6:25 7:21<br>8:7,19,20 28:23<br>32:11,15,16 36:25<br>38:10 39:8,11   | <b>r</b> 2:1,17 3:1 5:1<br>46:14,20 60:1<br>61:1<br><b>race</b> 49:15,25<br>53:14<br><b>raffensperger</b> 1:7<br>5:20 34:8<br><b>raffensperger's</b><br>4:14 33:20<br><b>rates</b> 61:20<br><b>read</b> 36:1,1 43:1,7<br>43:14 44:2 55:4,7<br>55:10 62:9 63:2<br><b>readable</b> 53:20<br>55:7,14 56:1<br>58:19<br><b>reading</b> 1:13 6:2<br>58:13<br><b>reality</b> 22:24 24:8<br><b>realized</b> 23:9 42:6<br><b>realizing</b> 55:22<br><b>really</b> 22:4<br><b>reason</b> 23:1,3<br>63:12,15,18,21,24<br>64:3,6,9,12,15,18<br><b>reasons</b> 63:7<br><b>recall</b> 15:20 16:9<br>29:18,19 40:13<br>43:16 44:3 57:16 |  |



|   |   |   |  |
|---|---|---|--|
| <b>releases</b> 23:24<br><b>rely</b> 45:12,13<br><b>remember</b> 15:18<br>21:20,21 22:16<br>27:1,11 47:18<br>48:12<br><b>reminding</b> 22:1<br><b>remote</b> 1:11 7:15<br><b>remotely</b> 2:3 5:13<br>7:15<br><b>repeat</b> 46:16 49:20<br>50:16<br><b>rephrase</b> 8:9 23:6<br>39:10 42:2 48:4<br>50:15 54:7<br><b>report</b> 4:16 25:14<br>25:16 26:11,17,20<br>32:8,10,19,20<br>40:25 41:7 43:7<br>43:14,23<br><b>reported</b> 26:10<br>48:15 49:5,10<br>60:6,10<br><b>reporter</b> 1:15 5:3<br>5:6,8,17,24,25<br>7:25 25:17 44:23<br>60:5,20<br><b>reporting</b> 47:9<br>61:4,7,12<br><b>represent</b> 6:13<br>29:2 36:22 38:9<br><b>represented</b> 6:17<br><b>request</b> 4:15 33:20<br>34:3,8 35:6,8,9,18<br>35:25 37:5 38:22<br>39:3,15<br><b>requests</b> 34:21<br>35:1<br><b>requirements</b> 5:4<br>16:3 | <b>reserved</b> 1:14 7:1<br>62:9<br><b>resign</b> 20:3<br><b>respect</b> 14:16 37:6<br>51:1 56:5 57:17<br>57:19<br><b>responded</b> 38:1<br><b>response</b> 8:14<br>26:16 32:11 36:7<br>36:25 37:3,5,23<br>38:11 39:1,2,2,4<br>39:15,22<br><b>responses</b> 4:14<br>7:23 33:19 34:7<br>34:21,24,25 35:7<br>35:12,18<br><b>responsiveness</b><br>6:25<br><b>restroom</b> 8:18<br><b>result</b> 45:9 46:8,14<br>46:21 48:24 49:11<br><b>results</b> 35:3 45:7<br>45:15 49:6 57:7<br><b>retired</b> 21:10<br><b>returned</b> 62:14,17<br><b>review</b> 9:23 62:10<br><b>ricardo</b> 34:20<br>35:17<br><b>riesdorph</b> 3:11<br><b>right</b> 9:15 10:22<br>11:17 19:8,22<br>24:13 25:4,6 28:9<br>29:6 34:2 41:12<br>43:5 62:9<br><b>rights</b> 22:2<br><b>ringer</b> 3:4<br><b>risky</b> 45:13<br><b>road</b> 2:13 62:3<br><b>roswell</b> 62:22<br><b>rule</b> 23:17 63:5 | <b>rules</b> 5:22 61:3,9<br>63:5<br><b>ryan</b> 37:20<br>s<br>s 2:1 3:1 5:1 11:19<br>61:1,1<br><b>safe</b> 31:14<br><b>saying</b> 7:24 48:9<br><b>says</b> 28:10,16,19<br>34:17,19 35:16<br>36:4 37:9 41:10<br>41:11,17,17,18<br><b>scanners</b> 18:11<br><b>school</b> 12:17,20<br>13:7,18<br><b>scratch</b> 59:2<br><b>screen</b> 58:18<br><b>screens</b> 55:18 56:1<br><b>seal</b> 60:20 62:15<br><b>secretary</b> 5:19<br><b>section</b> 5:4 61:8<br><b>security</b> 30:18<br><b>see</b> 17:11 23:24<br>28:13,16,17,19,23<br>34:17,22 36:20,21<br>37:5 41:16 45:6<br><b>seen</b> 55:18<br><b>send</b> 62:15,19<br><b>sense</b> 29:25<br><b>sent</b> 21:23<br><b>september</b> 1:16<br>5:8 61:22<br><b>series</b> 29:20 45:4<br><b>server</b> 38:17<br><b>service</b> 56:7 58:22<br><b>services</b> 20:8 59:1<br>61:7,13<br><b>share</b> 10:23 11:4,6<br>28:3,5 33:14<br>40:24 | <b>shared</b> 56:16<br><b>short</b> 40:14 45:1<br><b>shot</b> 38:6<br><b>shows</b> 11:6<br><b>sic</b> 3:21<br><b>side</b> 28:15<br><b>sidewalk</b> 25:7<br><b>sign</b> 62:9<br><b>signature</b> 60:20,22<br>61:23 62:6,18<br><b>signed</b> 62:12,14,17<br><b>signing</b> 1:13 6:3<br><b>simply</b> 51:13<br><b>sir</b> 5:25<br><b>sitting</b> 23:10<br><b>six</b> 20:14<br><b>social</b> 5:10<br><b>software</b> 46:15,21<br>48:24<br><b>son</b> 58:10<br><b>sorry</b> 10:12 19:10<br>19:16,19 21:9<br>25:13,24 26:6<br>35:5 41:17 49:21<br>54:8<br><b>sort</b> 26:1 41:21<br>42:22 55:22<br><b>sounds</b> 52:4<br><b>sp202</b> 23:18<br><b>speak</b> 7:19 10:10<br>23:20 27:16 38:19<br><b>speaking</b> 27:23<br>57:9<br><b>specific</b> 14:16<br>17:15 18:8 30:14<br>56:17<br><b>specifically</b> 14:8<br>14:23 20:9 30:12<br>34:3 55:3<br><b>speculate</b> 8:14 |
|---|---|---|--|



[speech - trusted]

Page 12

|  |   |   |  |
|--|---|---|--|
| <b>speech</b> 3:23 60:6<br><b>spelling</b> 3:22<br><b>spoke</b> 9:6 26:25<br>37:4<br><b>spoken</b> 29:18<br>57:24<br><b>stand</b> 37:13<br><b>start</b> 20:11 24:4<br>34:4 46:5<br><b>started</b> 19:9,14,16<br>19:16,20<br><b>starts</b> 34:19<br><b>state</b> 2:16 5:20<br>6:13 14:22 23:17<br>26:12,21 38:18<br>40:6 41:11 60:2,5<br><b>stated</b> 6:13 38:12<br><b>statement</b> 35:10<br>35:15,21 44:1<br>63:7<br><b>statements</b> 24:15<br>43:13 57:13,18,19<br>57:20 58:4<br><b>states</b> 1:1 40:8,11<br><b>stating</b> 6:15<br><b>stayed</b> 19:15,16<br><b>sterling</b> 25:23<br><b>stipulate</b> 5:11<br>44:12<br><b>stipulated</b> 5:15<br><b>stipulations</b> 1:12<br><b>story</b> 29:14<br><b>street</b> 2:8 3:6<br><b>stretch</b> 8:17<br><b>strictly</b> 22:19<br><b>strike</b> 54:7 59:2<br><b>study</b> 13:10<br><b>stuff</b> 17:12<br><b>subject</b> 30:6<br><b>subscribed</b> 64:21 | <b>substance</b> 63:6<br><b>successfully</b> 42:5<br><b>suite</b> 2:8,13,19 3:6<br>62:3,21<br><b>supervision</b> 60:8<br><b>support</b> 17:5,5,13<br><b>supporting</b> 17:13<br><b>supposed</b> 25:19<br><b>sure</b> 10:20 19:21<br>25:25 27:10 30:12<br>31:25 32:7 35:6,9<br>38:8 47:13 49:22<br>52:8 57:3,3<br><b>surrounding</b> 29:9<br><b>sw</b> 3:6<br><b>swear</b> 5:22<br><b>swearing</b> 5:12<br><b>switched</b> 46:13,19<br>46:24 47:15,24<br>48:1,5,10 49:17<br>50:2<br><b>switching</b> 48:23<br>49:10,23<br><b>switchings</b> 49:5<br><b>sworn</b> 6:8 64:21<br><b>system</b> 36:5,13,17<br>36:23,24 37:10,17<br>37:21 38:2,5,9<br>43:8,20,24 45:11<br>45:20,22 46:15,22<br>48:25 49:7,12<br>50:10,18 51:4,17<br>51:21 52:1,11<br><b>systems</b> 38:17 | <b>talk</b> 7:20,21 10:7<br><b>talked</b> 36:10 49:14<br><b>talking</b> 22:6 37:22<br>38:14,15 55:25<br><b>tallied</b> 54:25<br><b>tapes</b> 24:19,20,21<br>24:22 52:25<br><b>taylor</b> 2:18<br><b>taylorenglish.com</b><br>2:20,21<br><b>teacher</b> 19:13<br><b>tech</b> 3:11 28:8,14<br>28:18,22<br><b>tell</b> 41:13 42:9<br>47:3 55:5 56:14<br><b>tend</b> 10:12<br><b>tennessee</b> 58:14,16<br><b>term</b> 36:19,19,23<br>37:25 38:5<br><b>terminated</b> 20:2<br>21:7<br><b>testified</b> 6:9<br><b>testify</b> 8:13<br><b>testimony</b> 9:23<br>63:2,7<br><b>thank</b> 7:8 8:12<br>10:18,19 11:21<br>19:21 33:13 39:25<br>44:14 59:4,10<br><b>thanks</b> 6:1<br><b>thereto</b> 60:21<br><b>thing</b> 8:18 58:12<br><b>things</b> 17:3 23:11<br><b>think</b> 20:14,22<br>24:9,17 26:3<br>27:10,11 39:16<br>40:12,22 57:2,23<br>59:8<br><b>thought</b> 3:22<br><b>thursday</b> 1:16 | <b>time</b> 5:9 8:1,16<br>19:25,25 20:1<br>27:11 40:14,16,18<br>40:20 41:21 44:3<br>44:5 59:4 62:17<br><b>timeline</b> 19:22<br><b>times</b> 7:15 26:24<br>42:10 48:7<br><b>title</b> 34:11<br><b>today</b> 7:7 8:23<br>9:17 10:5<br><b>today's</b> 5:8<br><b>told</b> 26:1 47:5<br><b>top</b> 28:9<br><b>topics</b> 23:25 26:25<br><b>tracked</b> 17:8<br><b>trail</b> 24:12 31:23<br>56:14<br><b>trailing</b> 3:22<br><b>train</b> 17:22<br><b>trained</b> 15:1<br><b>training</b> 13:21<br>14:10,12,16,19,22<br>15:24,25 16:2,8,15<br>16:22,23 17:15,17<br>17:19,20,24 18:4,9<br>18:10<br><b>transcript</b> 3:20<br>60:9,18 62:10,15<br>62:17 63:2<br><b>transpired</b> 27:23<br><b>travel</b> 20:17<br><b>trial</b> 7:1 12:1,2<br>42:22<br><b>true</b> 60:8<br><b>trump</b> 46:14,20<br>47:15,25<br><b>trust</b> 41:24 42:3<br>54:16,20,22<br><b>trusted</b> 30:21 |
|  | <b>t</b><br><b>t</b> 11:19 60:1,1<br><b>take</b> 8:16,20 10:24<br>29:4 33:8 44:19<br><b>taken</b> 1:12 5:19<br>7:12 8:23 25:6,8<br>45:1   |   |  |



[trustworthy - zoom]

Page 13

|   |  |  |   |
|---|--|--|---|
| <b>trustworthy</b> 30:5<br><b>truthfully</b> 8:24<br><b>try</b> 7:18,19,20 8:9<br>10:23 39:9,9<br><b>trying</b> 35:6 40:12<br>57:23<br><b>turn</b> 33:13<br><b>turner</b> 20:10<br><b>two</b> 13:7 22:5 29:7<br><b>type</b> 14:4 41:11,18<br><b>types</b> 16:7 21:12  | <b>veritext</b> 3:11 9:9<br>62:13,20<br><b>video</b> 5:13<br><b>videoconference</b><br>1:11 2:4<br><b>vocational</b> 13:21<br><b>voiced</b> 58:1<br><b>vote</b> 30:21 31:18<br>40:1 41:23 42:7<br>42:17 47:11,11,11<br>48:9,23 49:5,10,22<br>54:3,6,9,15,17,18<br>54:19,21,23,25<br>55:5,8,19 56:8,10<br>58:9,13,18<br><b>voted</b> 18:15,17,19<br>27:4 31:6 40:6,16<br>40:20 41:21 42:13<br>42:14 55:21 56:5<br>58:9,11,17<br><b>voter</b> 14:11 21:11<br>21:12,14 22:4,9<br>41:7 50:5 57:14<br>57:20 58:5<br><b>voters</b> 21:16 28:23<br>57:10,11<br><b>votes</b> 31:10 46:11<br>46:18,24 47:15,24<br>48:10 49:16 50:1<br>51:17,21 52:1,11<br>52:13,16 53:3,4<br><b>voting</b> 14:8,9 16:5<br>16:6,11,14,19 18:1<br>18:20 19:3 22:2<br>22:24 23:16 24:7<br>24:9,16,17,23 27:2<br>27:3 30:19 42:1,4<br>43:24 56:16 57:2<br><b>vs</b> 1:6 | <b>w</b><br><b>wait</b> 18:18,18 48:7<br><b>waiting</b> 23:10 25:7<br><b>walking</b> 55:19<br><b>want</b> 25:25 27:15<br>29:4,21 35:9,24<br>55:20<br><b>wanted</b> 11:15<br>19:21 27:9<br><b>washington</b> 2:8<br><b>watch</b> 15:2<br><b>watched</b> 25:5<br><b>watcher</b> 14:10,25<br>15:1<br><b>watching</b> 14:13<br>15:13,25 21:15<br><b>way</b> 41:3 45:9,20<br>46:9 56:14,20<br>57:8<br><b>we've</b> 27:4<br><b>welcome</b> 44:15<br><b>went</b> 16:13,13<br>21:19 24:19 27:13<br>27:20 42:7 48:16<br><b>wide</b> 41:11<br><b>widespread</b> 50:5<br><b>william</b> 34:20<br>35:17<br><b>withdrawn</b> 60:16<br><b>witness</b> 1:16 4:3<br>5:12,16,23 10:12<br>10:15 28:13,17,21<br>28:23 43:12,13<br>44:1,22 46:1<br>59:10<br><b>woodcliff</b> 13:3<br><b>work</b> 19:11,22<br>20:19 21:12 28:18<br><b>worked</b> 15:10 17:2<br>17:3 19:7,8 20:7,9 | <b>worker</b> 15:11<br><b>workers</b> 24:23<br>25:18<br><b>working</b> 13:25<br>17:4 19:9,17 21:3<br><b>works</b> 19:3<br><b>world</b> 17:11<br><b>writings</b> 19:2<br><b>written</b> 21:15<br>57:13,17<br><b>wrong</b> 57:5<br><b>wrote</b> 21:25                 |
| <b>u</b>  |  |  | <b>x</b>  |
| <b>u</b> 61:1<br><b>uh</b> 3:23,24,24 7:24<br>7:24,24 9:7 16:12<br>22:13 24:24 29:11<br>40:19 43:11<br><b>undersigned</b> 60:19<br>63:2<br><b>understand</b> 8:8<br>33:7 38:25 42:2<br><b>understanding</b><br>29:23 30:8<br><b>understood</b> 8:2<br>24:13 31:4 45:14<br>54:2<br><b>unique</b> 57:8<br><b>united</b> 1:1<br><b>university</b> 38:18<br><b>unknown</b> 3:22<br><b>upcoming</b> 22:1<br><b>uploaded</b> 33:14<br><b>use</b> 7:1 8:17 23:21<br>25:16 54:13 63:8<br><b>usual</b> 61:20 |  |  | <b>x</b> 4:2  |
| <b>v</b>  |  |  | <b>y</b>  |
| <b>vague</b> 56:23<br><b>valid</b> 35:4<br><b>verbal</b> 7:23 57:19<br>57:20  |  |  | <b>yeah</b> 10:2 11:13<br>17:17 19:16,19<br>24:14 27:11 29:1<br>31:5 32:1,2 35:5<br>38:8,25 46:17<br>51:12 52:6,6 54:2<br>56:8,24 57:3<br><b>year</b> 27:8,9 44:8<br>44:13<br><b>years</b> 13:7 15:5<br>20:14 44:6,13<br><b>yellow</b> 27:7<br><b>york</b> 40:12,15 |
|   |  |  | <b>z</b>  |
|   |  |  | <b>zoom</b> 2:3 7:16,22   |

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.



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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**DEFENDANTS' NOTICE TO TAKE THE DEPOSITION OF  
PLAINTIFF LAURA DIGGES**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for Defendants Brad Raffensperger, et al., will take the oral examination under oath of Plaintiff Laura Digges on Thursday, September 23, 2021, beginning at 1:00 p.m. and continuing thereafter until completed via Zoom videoconferencing through Veritext Legal Solutions. Details regarding the videoconferencing will be emailed to those participating once all arrangements are finalized.

The deposition shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (e.g., videotape, LiveNote, etc.). The deposition will be taken for the purposes of cross-examination, discovery, and for all other

**Exhibit  
0001**



purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

This 3rd day of September, 2021.

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**CERTIFICATE OF SERVICE**

I hereby certify that, on September 3, 2021, I caused to be served the foregoing **DEFENDANTS' NOTICE TO TAKE THE DEPOSITION OF PLAINTIFF LAURA DIGGES** by email to the following:

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This 3rd day of September, 2021.

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btyson@taylorenghish.com

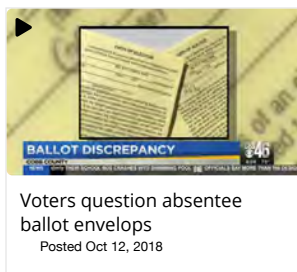
[https://www.cbs46.com/news/voters-question-absentee-ballot-envelopes/article\\_d7841ada-ce64-11e8-83f6-cb0f8b49bcd9.html](https://www.cbs46.com/news/voters-question-absentee-ballot-envelopes/article_d7841ada-ce64-11e8-83f6-cb0f8b49bcd9.html)

## Voters question ab

POSTED OCT 12, 2018



(Source: WGCL)



There are more questions surrounding the election and this one has to do with absentee ballots.

CBS46 is investigating and asking questions for you, the voters. We're looking into why your absentee ballot may look different than other voters in a story that's only on CBS46.

"The whole absentee ballot thing is just too difficult, to confusing for people. It shouldn't have to be this way," said voter Laura Digges.

She had a simple question -- why did her absentee ballot envelope in Cobb County ask for the year she was born?

**Exhibit  
0002**  
Laura Digges



Her friend, Ray Dafrico, who is also voting absentee, found the same thing.

"Mine says only year. And my wife's and daughter's say month and date. Now that might not seem very significant, but it could be a reason for them to not count them," said Dafrico.

The two felt so strongly, they went to the Cobb County Board of Elections Office and recorded what the absentee ballot coordinator told them.

"Either month and day, or if they write the year, no matter which is on the form, we'll accept it," the coordinator was recorded saying.

CBS46 investigated and as it turns out, the law changed last year. So, now the state asks for your birth year. But since there was inventory of the old "month and day" forms, those are still being handed out to voters.

But, here's why Dafrico and Digges are still concerned for other voters in other counties.

"It's up to each county. Each county processes the ballots that come in," said the coordinator on the recording.

We checked with the Cobb County elections director, and she told me, "We'll accept the month and day, or the year, as long as it matches what's on the voter's record," adding, "there is no confusion."

Because we care about voters in every county, we also asked the Secretary of State's Office.

A spokeswoman said, "The Secretary of State's Office does not process absentee ballot applications or absentee ballots. Local officials determine eligibility and sufficiency by following state law and rules."

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**COALITION FOR GOOD GOVERNANCE’S AND COALITION  
PLAINTIFFS’ OBJECTIONS AND RESPONSES TO DEFENDANT BRAD  
RAFFENSPERGER’S FIRST REQUEST FOR ADMISSION**

In accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure, the Coalition for Good Governance (“Coalition”), by and through counsel, hereby responds and objects to Defendant Brad Raffensperger’s First Requests for Admission to the Coalition, served December 28, 2020. Additionally, Plaintiffs Megan Missett, Ricardo Davis, Laura Digges, and Williams Digges (the “Coalition Plaintiffs”) join in responses and objections to Requests Nos. 9-30 which are identical to the Requests Nos. 1-22 addressed to Coalition Plaintiffs.

**RESPONSES AND OBJECTIONS TO REQUESTS**

**Request for Admission No. 1:**

Admit that the attached hereto as Exhibit A is a true and correct copy of your website's "Home" page as of December 22, 2020 with a URL of <https://coalitionforgoodgovernance.org/>.

**Response from Coalition:**

Admitted.

**Request for Admission No. 2:**

Admit that all donations received by you have been used exclusively to support the legal and forensic work in bringing effective challenges to un-auditable electronic voting systems in Georgia

**Response from Coalition:**

Coalition objects that this Request is irrelevant as it has no relevance to any claims in this case. Subject to that objection, Coalition responds: Denied.<sup>1</sup>

**Request for Admission No. 3:**

Admit that the attached hereto as Exhibit B is a true and correct copy of your website's "Current Projects" page as of December 22, 2020 with a URL of <https://coalitionforgoodgovernance.org/current-projects/>.

**Response from Coalition:**

Admitted.

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<sup>1</sup> Defendant David J. Worley's First Interrogatories ask for explanations and documents supporting any denial in these Requests. Full explanations for this any later denials may be found in Coalition's Response to those interrogatories.



**Request for Admission No. 4:**

Admit that you solicit donations to exclusively support your essential legal and forensic work.

**Response from Coalition:**

Coalition objects that this Request is irrelevant as it has no relevance to any claims in this case. Subject to that objection, Coalition responds: Denied.

**Request for Admission No. 5:**

Admit that all your essential legal and forensic work from July 3, 2017 to the present is related to the Litigation.

**Response from Coalition:**

Coalition objects that this Request is irrelevant as it has no relevance to any claims in this case. Subject to that objection, Coalition responds: Denied.

**Request for Admission No. 6:**

Admit the donations you solicit go only to cover your legal and forensic expenses.

**Response from Coalition:**

Coalition objects that this Request is irrelevant as it has no relevance to any claims in this case. Subject to that objection, Coalition responds: Denied.

**Request for Admission No. 7:**

Admit the only legal and forensic expenses you incurred from July 3, 2017 to the present relate to the Litigation.

**Response from Coalition:**

Coalition objects that this Request is irrelevant as it has no relevance to any claims in this case. Subject to that objection, Coalition responds: Denied.

**Request for Admission No. 8:**

Admit that you have not diverted any financial resources from Coalition's mission or purpose to pay expenses incurred by you in the Litigation.

**Response from Coalition:**

Coalition objects that this Request is irrelevant as it has no relevance to any claims in this case. Subject to that objection, Coalition responds: Denied.

**Request for Admission No. 9:**

Admit that you believe the results of the Presidential Election held on November 3, 2020 in Georgia are valid.

**Response from Coalition:**

Coalition Plaintiffs object to this Request as vague and ambiguous as it does not define the term "valid." The term might mean that the correct winners were chosen, or the exactly correct tallies determined, or that the results were reached through proper processes with full adherence to applicable laws, or other definitions Coalition Plaintiffs do not anticipate. Because of the ambiguity of the

Request, Coalition Plaintiffs presently lack sufficient information or knowledge to admit or deny this Request.

**Request for Admission No. 10:**

Admit that you believe the results of the other elections held on November 3, 2020 in Georgia are valid.

**Response from Coalition:**

Coalition object to this Request as vague and ambiguous as it does not define the term “valid.” The term might mean that the correct winners were chosen, or the exactly correct tallies determined, or that the results were reached through proper processes with full adherence to applicable laws, or other definitions Coalition Plaintiffs do not anticipate. Because of the ambiguity of the Request, Coalition Plaintiffs presently lack sufficient information or knowledge to admit or deny this Request.

**Request for Admission No. 11:**

Admit that you have no evidence that any component of the Election System was actually hacked prior to or during the elections held on November 3, 2020.

**Response from Coalition:**

Denied.

**Request for Admission No. 12:**



Admit that you have no evidence that any malware was actually inserted into any component of the Election System prior to or during the elections held on November 3, 2020.

**Response from Coalition:**

Denied.

**Request for Admission No. 13:**

Admit that you have no evidence that the results of any election held in Georgia held on November 3, 2020 were actually changed in any way as a result of the hacking of or the insertion of malware into any component of the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 14:**

Admit that you have no evidence that any vote(s) in the Presidential Election held on November 3, 2020 in Georgia were actually switched from President Donald J. Trump to Joseph R. Biden, Jr. as a result of an anomaly in the software used in the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 15:**

Admit that you have no evidence that any vote(s) in the Presidential Election held on November 3, 2020 were actually switched from President Donald J. Trump to Joseph R. Biden, Jr. as a result of an algorithm or any other design feature of the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 16:**

Admit that you have no evidence that any vote(s) in the Presidential Election held on November 3, 2020 were actually switched from President Donald J. Trump to Joseph R. Biden, Jr. as a result of any problem of any kind with any component of the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 17:**

Admit that you have no evidence that any vote(s) in any election held in Georgia on November 3, 2020 were actually switched from any candidate to another as a result of an anomaly in the software used in the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 18:**

Admit that you have no evidence that any vote(s) in any election held in Georgia on November 3, 2020 were actually switched from one candidate to another as a result of an algorithm or any other design feature of the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 19:**

Admit that you have no evidence that any vote(s) in any election held in Georgia on November 3, 2020 were actually switched from one candidate to another as a result of any problem of any kind with any component of the Election System.

**Response from Coalition:**

Denied.

**Request for Admission No. 20:**

Admit that you have no evidence of any widespread voter fraud in Georgia in connection with the elections held in Georgia on November 3, 2020.

**Response from Coalition:**

Admitted.

**Request for Admission No. 21:**



Admit that you have no evidence of any malfunction(s) of any component of the Election system that impacted the outcome of the Presidential Election held in Georgia on November 3, 2020.

**Response from Coalition:**

Admitted.

**Request for Admission No. 22:**

Admit that you have no evidence of any malfunction(s) of any component of the Election System that impacted the outcome of any of the other elections held in Georgia on November 3, 2020.

**Response from Coalition:**

Admitted.

**Request for Admission No. 23:**

Admit that you have no evidence that the Election System failed to count any legal vote(s) in the Presidential Election held on November 3, 2020 in Georgia.

**Response from Coalition:**

Denied.

**Request for Admission No. 24:**

Admit that you have no evidence that the Election System counted any illegal vote(s) in the Presidential Election held on November 3, 2020 in Georgia.

**Response from Coalition:**

Admitted.

**Request for Admission No. 25:**

Admit that you have no evidence that the Election System failed to count any legal vote(s) in any of the other elections held in Georgia on November 3, 2020.

**Response from Coalition:**

Denied.

**Request for Admission No. 26:**

Admit that you have no evidence that the Election System counted any illegal vote(s) in any of the other elections held in Georgia on November 3, 2020.

**Response from Coalition:**

Admitted.

**Request for Admission No. 27:**

Admit that you are not contesting the outcome of the Presidential Election held in Georgia on November 3, 2020.

**Response from Coalition:**

Admitted.

**Request for Admission No. 28:**

Admit that you are not contesting the outcome of any of the other elections held in Georgia on November 3, 2020.

**Response from Coalition:**

Admitted.

**Request for Admission No. 29:**

Admit that you have no evidence that there was any mismatch between the QR Codes on the Paper Ballots cast in the Presidential Election held on in Georgia on November 3, 2020 election and the human-readable portion of the Paper Ballots.

**Response from Coalition:**

Denied.

**Request for Admission No. 30:**

Admit that you have no evidence that there was any mismatch between the QR Codes on the Paper Ballots cast in any of the other elections held on in Georgia on November 3, 2020 election and the human-readable portion of the Paper Ballots.

**Response from Coalition:**

Admitted.



This 27th day of January, 2021.

/s/ Bruce P. Brown

Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III  
Admitted Pro Hac Vice  
(ECF No. 125)  
ROBERT MCGUIRE LAW FIRM  
113 Cherry St. #86685  
Seattle, Washington 98104-2205  
(253) 267-8530

*Counsel for Coalition for Good Governance*

/s/ Cary Ichter

Cary Ichter  
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Suite 1530  
Atlanta, Georgia 30326  
(404) 869-7600

*Counsel for Megan Missett, Ricardo Davis, Laura Digges, and William Digges*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2021, I served a copy of the foregoing upon counsel for the Defendants and the Curling Plaintiffs via electronic mail.

/s/ Bruce P. Brown

Bruce P. Brown

**Exhibit****0004**

Laura Digges

Inquiry &gt; Voter Registration

## Inquiry - View Voter Registration

## Voter Information

Voter Name: LAURA MARIE DIGGES  
 Date of Birth: [REDACTED] 1953  
 Race: OTHER  
 Gender: FEMALE  
 Voter Registration #: 03516344  
 Registration Date: 01/26/1996  
 Current Status: ACTIVE  
 Status Reason:  
 Voter Phone:  
 E-mail:  
 DL #/State ID: [REDACTED]  
 Site ID / Location: 01 - DDS  
 SSN (Full OR Last 4 Digits): [REDACTED]  
 ID Required: NO  
 US Citizen: YES  
 Challenged Elector: NO

## Residence Address

Street No.: [REDACTED]  
 Street Name: [REDACTED]  
 Suffix:  
 Apt/Unit:  
 Address Line 2:  
 Municipality:  
 Postal City: MARIETTA  
 County: COBB  
 Zip Code: 30066 [REDACTED]  
 State: GA  
 Added Date: 02/17/1996  
 Change/Audit Date: 12/09/2020  
 Date of Last Contact: 12/09/2020  
 Date of Last Status Change: 05/09/2006  
 Poll Worker Interest:

## Voting Districts

Congressional 006  
 Senate 032  
 House 044  
 Judicial COBB

## County Districts

Commission 3  
 School 4

## Municipal Districts

County Precinct: BW01  
 Municipal Precinct: -  
 Voting Area/Combo #: 00605

## County Polling Place:

NORTHEAST COBB COMMUNITY CENTER-  
 BW01  
 3100 JAYCEE DR  
 MARIETTA, GA 30066 - 0000

## Municipal Polling Place:

VoteSafe: Display Actual Address Display Signature

## Mailing Address

Street No.:  
 Suffix:  
 Street Name / PO Box:  
 Address Line 2:

Apt/Unit:  
 Mailing City:  
 Mailing State:  
 Zip Code:

User Name

Date/Time

Memo

Previous

Voter Name

Registration Date

Voter Registration #

Voter Address

LAURA MARIE DIGGES

01/26/1996

03516344

[REDACTED]  
MARIETTA 30066 - 3479

## Previous Address:

Street No

Street Name

Apt/Unit

Suffix

Address Line 2

City

State

Zip Code

[REDACTED]

[REDACTED]

MARIETTA

GA

30062 - 3265

Previous

Voter Name

Registration Date

Voter Registration #

Voter Address

LAURA MARIE DIGGES

01/26/1996

03516344

[REDACTED]  
MARIETTA 30066 - 3479

| Date       | Election Type           | Election Category | Ballot Type | Challenged | Challenged Reason | Challenged Status | Party    | Counted | Comments | County Vote Cast In |
|------------|-------------------------|-------------------|-------------|------------|-------------------|-------------------|----------|---------|----------|---------------------|
| 11/05/1996 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/07/2000 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/05/2002 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/02/2004 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/07/2006 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/04/2008 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 12/02/2008 | GENERAL ELECTION RUNOFF | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/02/2010 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 07/31/2012 | SPECIAL ELECTION        | STATE WIDE        | Regular     |            |                   |                   | DEMOCRAT | Yes     |          | COBB                |
| 11/06/2012 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/04/2014 | GENERAL                 | STATE WIDE        | Regular     |            |                   |                   |          | Yes     |          | COBB                |
| 11/08/2016 | GENERAL                 | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |
| 04/18/2017 | SPECIAL ELECTION        | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |
| 05/16/2017 | SPECIAL ELECTION RUNOFF | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |
| 06/20/2017 | SPECIAL ELECTION RUNOFF | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |
| 05/22/2018 | GENERAL PRIMARY         | STATE WIDE        | Absentee    |            |                   |                   | DEMOCRAT | Yes     |          | COBB                |
| 07/24/2018 | GENERAL PRIMARY RUNOFF  | STATE WIDE        | Regular     |            |                   |                   | DEMOCRAT | Yes     |          | COBB                |
| 11/06/2018 | GENERAL                 | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |
| 12/04/2018 | GENERAL ELECTION RUNOFF | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |
| 03/24/2020 | PPP                     | STATE WIDE        | Absentee    |            |                   |                   | DEMOCRAT | Yes     |          | COBB                |
| 06/09/2020 | GENERAL PRIMARY         | STATE WIDE        | Absentee    |            |                   |                   | DEMOCRAT | Yes     |          | COBB                |
| 08/11/2020 | GENERAL PRIMARY RUNOFF  | STATE WIDE        | Absentee    |            |                   |                   | DEMOCRAT | Yes     |          | COBB                |
| 11/03/2020 | GENERAL                 | STATE WIDE        | Absentee    |            |                   |                   |          | Yes     |          | COBB                |



| 01/05/2021   | GENERAL ELECTION RUNOFF | STATE WIDE                     | Absentee                    | Yes                  | COBB          |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
|--|-------------------------|--------------------------------|-----------------------------|----------------------|---------------|------------------------|-------------------------|----------------------|--------------------|----------------------|---------------|-----------------------|-----------------------|----------|-----------------------|
| Previous   |                         |                                |                             |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| <table border="1"> <tr> <th>Voter Name</th> <th>Registration Date</th> <th>Voter Registration #</th> <th>Voter Address</th> </tr> <tr> <td>LAURA MARIE DIGGES</td> <td>01/26/1996</td> <td>03516344</td> <td>MARIETTA 30066 - 3479</td> </tr> </table> |                         |                                |                             |                      |               | Voter Name             | Registration Date       | Voter Registration # | Voter Address      | LAURA MARIE DIGGES   | 01/26/1996    | 03516344              | MARIETTA 30066 - 3479 |          |                       |
| Voter Name   | Registration Date       | Voter Registration #           | Voter Address               |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| LAURA MARIE DIGGES   | 01/26/1996              | 03516344                       | MARIETTA 30066 - 3479       |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| <b>Change/Audit Date - Time</b>  | <b>Action</b>           | <b>Type of Change</b>          | <b>Date of Last Contact</b> | <b>Change Reason</b> | <b>County</b> | <b>Changed User ID</b> | <b>Site ID/Location</b> |                      |                    |                      |               |                       |                       |          |                       |
| 12/09/2020 12:01 PM  | CHANGE                  | Other                          | 12/09/2020                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 11/12/2020 12:39 PM  | CHANGE                  | Other                          | 11/12/2020                  | ABSENTEE BALLOT      | COBB          | 033LARTHUR             |                         |                      |                    |                      |               |                       |                       |          |                       |
| 11/11/2020 1:04 PM   | CHANGE                  | Other                          | 11/11/2020                  | ABSENTEE BALLOT      | COBB          | 033BBARRON             |                         |                      |                    |                      |               |                       |                       |          |                       |
| 10/02/2020 12:45 PM  | CHANGE                  | Other                          | 10/02/2020                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 07/23/2020 11:24 AM  | CHANGE                  | Other                          | 07/23/2020                  | ABSENTEE BALLOT      | COBB          | 033USERSIX             |                         |                      |                    |                      |               |                       |                       |          |                       |
| 07/07/2020 1:42 PM   | CHANGE                  | Other                          | 07/07/2020                  | ABSENTEE BALLOT      | COBB          | 033PCHURCHILL          |                         |                      |                    |                      |               |                       |                       |          |                       |
| 07/07/2020 10:45 AM  | CHANGE                  | Other                          | 07/07/2020                  | ABSENTEE BALLOT      | COBB          | 033PCHURCHILL          |                         |                      |                    |                      |               |                       |                       |          |                       |
| 05/15/2020 8:21 AM   | CHANGE                  | Other                          | 05/15/2020                  | ABSENTEE BALLOT      | COBB          | 033UFOURF              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 03/31/2020 7:42 AM   | CHANGE                  | Other                          | 03/31/2020                  | ABSENTEE BALLOT      | COBB          | 033KBROWN              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 03/30/2020 1:24 PM   | CHANGE                  | Other                          | 03/30/2020                  | ABSENTEE BALLOT      | COBB          | 033JWILLS              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 03/09/2020 12:40 PM  | CHANGE                  | Other                          | 03/09/2020                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 02/03/2020 11:49 AM  | CHANGE                  | Other                          | 02/03/2020                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 02/03/2020 11:46 AM  | CHANGE                  | Other                          | 02/03/2020                  | ABSENTEE BALLOT      | COBB          | 033SPRILL              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 11/30/2018 11:33 AM  | CHANGE                  | Other                          | 11/30/2018                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 11/16/2018 11:11 AM  | CHANGE                  | Other                          | 11/16/2018                  | ABSENTEE BALLOT      | COBB          | 033MBUNCH              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 10/12/2018 2:58 PM   | CHANGE                  | Other                          | 10/12/2018                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 09/25/2018 12:46 PM  | CHANGE                  | Other                          | 09/25/2018                  | ABSENTEE BALLOT      | COBB          | 033KINSBRUNNER         |                         |                      |                    |                      |               |                       |                       |          |                       |
| 08/09/2018 10:29 PM  | CHANGE                  | Other                          | 07/24/2018                  | Express Poll In      |               | JHALLMAN               |                         |                      |                    |                      |               |                       |                       |          |                       |
| 05/09/2018 11:47 AM  | CHANGE                  | Other                          | 05/09/2018                  | ABSENTEE BALLOT      | COBB          | 033JIMAYES             |                         |                      |                    |                      |               |                       |                       |          |                       |
| 04/27/2018 11:02 AM  | CHANGE                  | Other                          | 04/27/2018                  | ABSENTEE BALLOT      | COBB          | 033JNICHELSON          |                         |                      |                    |                      |               |                       |                       |          |                       |
| 05/15/2017 9:40 AM   | CHANGE                  | Other                          | 05/15/2017                  | ABSENTEE BALLOT      |               | 033MFIELDS             |                         |                      |                    |                      |               |                       |                       |          |                       |
| 05/12/2017 11:28 AM  | CHANGE                  | Other                          | 05/12/2017                  | ABSENTEE BALLOT      | COBB          | 033PDOUGHTEN           |                         |                      |                    |                      |               |                       |                       |          |                       |
| 05/03/2017 10:23 AM  | CHANGE                  | Other                          | 05/03/2017                  | ABSENTEE BALLOT      | COBB          | 033DROSS               |                         |                      |                    |                      |               |                       |                       |          |                       |
| 05/02/2017 9:47 AM   | CHANGE                  | Other                          | 05/02/2017                  | ABSENTEE BALLOT      | COBB          | 033DROSS               |                         |                      |                    |                      |               |                       |                       |          |                       |
| 04/08/2017 12:48 PM  | CHANGE                  | Other                          | 04/08/2017                  | ABSENTEE BALLOT      | COBB          | 033EHAZEL              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 10/31/2016 7:05 PM   | CHANGE                  | Other                          | 10/31/2016                  | ABSENTEE BALLOT      | COBB          | 033CBAKER              |                         |                      |                    |                      |               |                       |                       |          |                       |
| 11/20/2014 9:13 PM   | CHANGE                  | Other                          | 11/04/2014                  | Express Poll In      |               | SJACKSON               |                         |                      |                    |                      |               |                       |                       |          |                       |
| 11/06/2012 12:00 AM  | NEW VOTER               |                                | 11/06/2012                  | CON                  |               | ENETCONV               | 01 - DDS                |                      |                    |                      |               |                       |                       |          |                       |
| Previous   |                         |                                |                             |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
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| Voter Name   | Registration Date       | Voter Registration #           | Voter Address               |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| LAURA MARIE DIGGES   | 01/26/1996              | 03516344                       | MARIETTA 30066 - 3479       |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| <b>Notice Type</b>   | <b>Date Sent</b>        | <b>Response Date</b>           | <b>Comments</b>             | <b>Letter</b>        |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| Previous   |                         |                                |                             |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| <table border="1"> <tr> <th>Voter Name</th> <th>Registration Date</th> <th>Voter Registration #</th> <th>Voter Address</th> </tr> <tr> <td>LAURA MARIE DIGGES</td> <td>01/26/1996</td> <td>03516344</td> <td>MARIETTA 30066 - 3479</td> </tr> </table> |                         |                                |                             |                      | Voter Name    | Registration Date      | Voter Registration #    | Voter Address        | LAURA MARIE DIGGES | 01/26/1996           | 03516344      | MARIETTA 30066 - 3479 |                       |          |                       |
| Voter Name   | Registration Date       | Voter Registration #           | Voter Address               |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| LAURA MARIE DIGGES   | 01/26/1996              | 03516344                       | MARIETTA 30066 - 3479       |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| <b>Date of Cancellation</b>  | <b>Status</b>           | <b>Reject/Cancelled Reason</b> | <b>Comments</b>             |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |
| Previous   |                         |                                |                             |                      |               |                        |                         |                      |                    |                      |               |                       |                       |          |                       |